



## County of San Diego

MARK WARDLAW  
DIRECTOR

PLANNING & DEVELOPMENT SERVICES  
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KATHLEEN A. FLANNERY  
ASSISTANT DIRECTOR

Please See Bronwyn  
or Ben if you  
have questions.

January 30, 2018

Pat Brown,  
7901 Von Karman Ave, #1050  
Irvine, CA 92614

**PROJECT NAME:** JVR Solar Major Pre-Application

**RECORD ID:** PDS2017-MPA-17-016

**PROJECT ADDRESS:** Interstate 8 with Old Highway 80, within the Jacumba Community Planning area in the unincorporated area of San Diego County;

**APNS:** 614-100-20, 614-100-21, 614-110-04, 660-020-05, 660-020-06, 660-150-04, 660-150-07, 660-150-08, 660-150-10, 660-150-14, 660-150-17, 660-150-18, 660-170-09, 661-010-02, ~~661-010-02~~, 661-010-15, 661-010-26, 661-010-27, 661-010-30, 661-060-12, 661-060-22

**TRUST ACCOUNT NO.:** 2085587-D-05332

Dear Mr. Brown:

On January 12, 2018, Planning & Development Services (PDS) held a Pre-application Meeting on the above listed APN(s). This letter provides a summary of the major issues discussed at the conference, key decisions or determination, and guidance for project processing.

### **COMMUNITY PLANNING GROUP COORDINATION**

Planning & Development Services (PDS) strongly recommends coordination with the Jacumba Community Planning Group prior to application submittal, as the Department will consider comments from applicable community groups in its decision making process. See the following links for a list of the Planning, Sponsor and Design Review Board chairpersons and contact information:

Planning and Sponsor Group: <http://www.sdcountry.ca.gov/PDS/docs/plngchairs.pdf>

— Please send receipt to  
Erin.

Thank you.

SDC PDS RCVD 11-16-18  
GPA18-010, REZ18-007,  
MUP18-022

## **OVERVIEW**

### **Attendees**

The following County staff and Applicant representatives attended the Pre-application Meeting:

<b>NAME</b>	<b>ORGANIZATION</b>
Bronwyn Brown	PDS, Project Manager
Benjamin Mills	PDS, Planning Manager
Susan Harris	PDS, Environmental Coordinator
Tona Avalos	PDS, Civil Engineer
Kimberly Smith	PDS, Biologist
Kassandra Nearn	PDS, Cultural Specialist
Jim Bennett	PDS, Groundwater Geologist
James Pine	County Fire
Greg Schreiner	County Fire
Eric Nelson	County Airport Engineer
Marc Baskel	County Airport Manager
Pat Brown	Baywa-re Development LLC
David Hochart	Dudek
Steve Wragg	Michael Baker International

### **Project Description**

Below is the project description that staff has generated from the information provided in the application package. Please review this project description and verify with staff that the project description is correct:

The applicant is requesting a General Plan Amendment, Rezone, Major Use Permit and a Certificate of Compliance for a solar facility and energy storage. The project consists of a one phase 100 megawatt (MW) solar farm including: photovoltaic (PV) solar panels; utilization of single axis tracking systems; a 1,500-volt direct current (DC) underground collection systems; a 34.5-kilovolt (kV) overhead and underground collection system linking the trackers to an on-site project substation; a 20 MW energy storage facility would be located in 20 self-6,800 square feet steel containers containing lithium-ion batteries and will be located throughout the project site; a 10,000 square foot operations and maintenance (O&M) building; a X-acre on-site private collector substation site encompassing a fenced pad area of approximately XXXX square feet and a maximum height of XX feet to store approximately XXXX square feet of equipment, including XXX square feet of metal-clad switchgear; a XXX mile dual circuit 138kV overhead/underground transmission connection line (gen-tie) that would connect onsite. The project site is located south of I-8 with Old Highway 80 running east-west through the southern portion of the site in the Jacumba Community Planning area, within unincorporated San Diego County. The site is subject to the General



Plan Rural Regional Category, Rural Lands 40 (RL-40) and Specific Plan Area Land Use Designation, and zoned General Rural (S92), Open Space (S80), and Specific Plan (S88). The site is mainly undeveloped with some abandoned structures that propose to be removed. Access would be provided at Old Highway 80 and a secondary access from Carrizo Gorge Road (614-100-20, 614-100-21, 614-110-04, 660-020-05, 660-020-06, 660-150-04, 660-150-07, 660-150-08, 660-150-10, 660-150-14, 660-150-17, 660-150-18, 660-170-09, 661-010-02, 661-010-02, 661-010-15, 661-010-26, 661-010-27, 661-010-30, 661-060-12, 661-060-22)

#### Land Use Designation and Zoning:

CURRENT ZONING REGULATIONS		CONSISTENT?
Use Regulation:	S80, S88, S92	<b>Y, With approval of a GPA, Rezone, MUP</b>
Animal Regulation:	W	N/A
Density:	1.7	N/A
Lot Size:	20AC/8AC/10,000SQ FT	N/A
Building Type:	C/L	N/A
Height:	G (35')	<b>Y, With approval of a MUP</b>
Lot Coverage:	N/A	N/A
Setback:	C/D	<b>TBD</b>
Open Space:	N/A	N/A
Special Area Regulations:	C	N/A

#### MAJOR PROJECT ISSUES

The following project issues were identified during the project pre-application scoping and are further discussed in the attachments to this letter. These issues may require substantial redesign of the proposed project or, if not resolved, would result in a recommendation for project denial by PDS. These issues discussed below, were identified based upon information presently available to the County and are subject to change upon submittal of further information and studies:

##### **1. California Environmental Quality Act:**

The proposed project appears to have the potential to result in significant direct and cumulative impacts under the California Environmental Quality Act (CEQA) and an Environmental Impact Report (EIR) will be required.

##### **2. General Plan Amendment and Rezone:**

The project is located with a Specific Plan Land Use Designation and is zoned Specific Plan. A solar farm project is considered a Major Impact Services and Utilities use pursuant to the County's Zoning Ordinance and is not permitted within a Specific Plan Land Use Designation. A General Plan Amendment and Rezone to change the land use designation and zoning is required

### 3. Major Use Permit (MUP) Findings:

A Major Use Permit will also be required. In accordance with Section 7358 of the Zoning Ordinance, it shall be found:

- a. That the location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures, with consideration given to:
  - Harmony in scale, bulk, coverage and density;
  - The availability of public facilities, services and utilities;
  - The harmful effect, if any, upon desirable neighborhood character;
  - The generation of traffic and the capacity and physical character of surrounding streets;
  - The suitability of the site for the type and intensity of use or development which is proposed; and to
  - Any other relevant impact of the proposed use; and
- b. That the impacts, as described in paragraph "a" of this section, and the location of the proposed use will be consistent with the San Diego County General Plan.
- c. That the requirements of the California Environmental Quality Act have been complied with.

Please provide additional, quantitative information that accurately describes the scale, bulk, coverage and intensity of the proposed energy storage facility in relation to existing uses in the area. Please provide draft MUP Findings. Ongoing coordination between County staff and the applicant will be required to adequately address the MUP findings. Staff cannot move forward with a recommendation until all findings are made. In addition, staff has identified several General Plan and community plan policies for which additional information will be needed to determine the project's compliance. Staff cannot move forward with a recommendation of approval until the project is found consistent with all applicable General Plan and community plan policies.

### 4. Jacumba Airport:

The project is located within the Airport Influence Area (AIA) of the Jacumba airport. The project is located within Zone 1 - Zone 6 of the Airport's Airport Land Use Compatibility Plan (ALUCP). Solar Panels are not compatible within the Runway Protection Zone (RPZ), Safety Zone 1 of the ALUCP. Zone 2 has a lot coverage maximum of 50% and Zone 4 has a lot coverage maximum of 70%. It is not clear if the project proposes to encroach into that zone. As such, it is not known at this time if an airport hazards assessment is required. The plot plan must depict to scale the safety zones over the affected properties. Please identify the lot coverage percentage of the solar panels in these zones to determine compliance with this regulation.



Solar panels could be a glare and glint hazard for aircraft in flight. The project must demonstrate that glare will not impact airspace safety. Recommendations for meeting this standard are described in Section 3.1.2 of the Federal Aviation Administration (FAA) Solar Guide. For off-airport projects, local governments, solar developers, and other stakeholders in the vicinity of an airport have the responsibility to inform the FAA about proposed projects so that the agency can determine if the project, specifically if large, presents any safety or navigational problems. A photovoltaic glint and glare study will be required. It is recommended that the applicant work directly with the County of San Diego Airport Staff with respect to the glint and glare study County Regional Airport Authority and subsequently attain the necessary Federal Aviation Administration (FAA) and State Division of Aeronautics approvals.

**5. Visual Resources:**

Based on an initial review, it appears that proposed project may adversely affect visual resources. Views from scenic vistas, scenic highways and County Scenic Routes will need to be analyzed further to determine the extent of any adverse impacts. Visual resources can include narrow or expansive views, views from one site or from a series of sites as along a scenic highway and views above, at eye level, or from below. A Visual Resources Study is required. The report should identify changes/modifications of the project from the original and provide mitigation and design considerations to reduce the visual impacts associated with this project. The recommended mitigation and design considerations should be incorporated into the project design.

**6. Cultural Resources:**

A cultural resources constraints analysis was completed by Dudek for the proposed project titled "Cultural Resources Constraints Analysis for the Jacumba Valley Ranch Solar Project, San Diego County, California," (November 2017). The constraints analysis consisted of a cultural records search that identified numerous cultural resources within the proposed project area. These resources include individual archaeological sites and the Jacumba Valley Archaeological District (JVAD). The JVAD has been determined eligible for listing in the National Register of Historic Places (NRHP); therefore, it is considered a significant resource under CEQA.

Major Project Issue: The current design of the proposed project may result in unmitigable significant impacts to cultural resources. Re-design is recommended to avoid any significant resources that are identified in the required cultural studies. As discussed in the constraints analysis, it should be noted that if any federal permits are required for the project, then Section 106 of the National Historic Preservation Act (NHPA) and consultation with the State Historic Preservation Officer regarding project effects to the district would also apply.

**7. Biological Resources:**

The project site contains wetlands and jurisdictional waters of the U.S./State, which are subject to the Resource Protection Ordinance (RPO) and permitting requirements of federal and state authorizing agencies as outlined below. The RPO prohibits impacts to RPO significant wetlands and wetland buffers as described in the Attachment.

**8. Fire Services Agreement:**

This project, along with all other development, has a cumulative impact on the emergency services for this community. Due to the unique nature of the proposed project, additional equipment/staff/training will likely be necessary. To mitigate for this impact, the project will be required to participate in an emergency services agreement with the San Diego County Fire Authority. Please see project issue checklist for additional fire comments.

In addition to the issues outlined in this letter, it is strongly recommended that you contact other agencies to determine additional project requirements. The following link provides an Agency Contact List to assist in your due diligence efforts:  
<http://www.sdcounty.ca.gov/pds/docs/pds804.pdf>

***To be filled out and signed by the financially responsible party:***

*I certify that I am the financially responsible party for the General Plan Amendment application, have reviewed and acknowledge the major project issues identified in this letter.*

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*Signature*

---

*Date*

---

*Print Name*



### **ESTIMATE OF DISCRETIONARY PROCESSING COSTS AND SCHEDULE**

An estimate of discretionary processing time and costs that includes several assumptions has been generated for your project and is included in **Attachment B**. It is estimated that **\$750,000.00-\$950,550.00** of County fees and deposits will be required to get the project through to a hearing. The total estimated time to process the proposed project is **25-35 months**. Attachment B includes the County's standard applicant submittal dates, three EIR iterations, and a submittal occurring within 60 days of the resubmittal of the project. The estimated hearing date for this project is between **Fall 2019 to Summer 2020**. Attachment B includes two schedules; one which includes the County's standard applicant submittal dates, three EIR iterations, and a submittal occurring within 60 days of the resubmittal of the project and a second which includes modified/shortened applicant submittal dates. Please note that the estimated cost and hearing date is based on certain assumptions detailed in the Attachment and could be more or less than the estimate provided. If the cost and schedule assumptions prove to be incorrect, the estimate will be revised. The estimate includes only the costs to get your present application to hearing and does not include additional post discretionary processing costs such as condition satisfaction and building permit fees.

Should your application be approved, there will be additional processing costs in the future (e.g., park fees, drainage fees, building permit fees). To obtain an estimate of future building permit and plan check fees, parks fees, and Traffic Impact Fees, see <http://www.sdcountry.ca.gov/PDS/bldgforms/index.html#fees>.

Please note that building permits are required to construct, enlarge, alter, repair, move, improve, remove, convert, or demolish a building or structure. Permits are also required for plumbing, electrical, and mechanical work. A permit must be obtained prior to construction and prior to occupancy. Failure to obtain a building permit is a violation of the County of San Diego Ordinances.

The Department's goal is to help facilitate the efficient and timely processing of each application. If, however, a project becomes delayed due to excessive project inactivity or account deficit, Board Policy I-137 will apply; please refer to the Board Policy I-137 at <http://www.co.san-diego.ca.us/cob/docs/policy/I-137.pdf> and the FAQ sheet at <http://www.sdcountry.ca.gov/luegdocs/PDS%20FORMS/Cover%20Sheets/Zoning%20Forms/PDS-907,%20processing%20inactive,%20deficit%20projects.pdf> for the Processing of Inactive and Deficit Projects.

### **DEFENSE AND INDEMNIFICATION**

The Board of Supervisors may require a defense and indemnification agreement from the project owner and/or applicant on a case-by-case basis where significant risk to the County is identified in connection with the processing of a discretionary land use development project. The County will notify applicants of the requirement for a defense and indemnification agreement as early in the project processing as possible. Please see the Defense and Indemnification FAQ sheet (<http://www.sdcountry.ca.gov/pds/zoning/formfields/PDS-209.pdf>) for more information.



**DEPARTMENT RECOMMENDATION**

Comments and information in this letter, or lack thereof, should not be construed as the Department implying an overall recommendation or decision on your project. Planning & Development Services generally makes a final recommendation or decision to approve or deny a project when all planning analysis and environmental documentation is complete and, if applicable, Planning/Sponsor Group input is received.

**DETERMINATIONS**

The following decisions or determinations were made at the Pre-application Meeting:

- An Airport Hazards Study and Solar Photovoltaic Glint and Glare Study shall be prioritized and submitted for Staff's review and forwarded to the FAA for preliminary review.
- A Site Visit between Staff and Applicant to occur.
- A formal submittal of the project to occur prior to June 22, 2018.

**PROJECT PROCESSING GUIDANCE**

Planning & Development Services (PDS) has reviewed your pre-application submittal for a solar facility and energy storage project and is providing you with the attached package of information as a guide for further processing your application. A Project Issues Checklist for all issues, revisions or processing requirements has been prepared for your project and is included in this letter as Attachment A. **This checklist shall be used by the County and the applicant as the checklist of project issues that must be resolved and revisions that must be completed prior to public review under the California Environmental Quality Act (CEQA), or decision if no circulation of environmental documentation is required pursuant to CEQA.** In response to the Project Issues Checklist, the applicant is expected to include a letter with every submittal made to the Department stating how each item number in the Checklist has been addressed.

**CONSULTANT LIST & MEMORANDUM OF UNDERSTANDING (MOU)**

Certain technical studies must be prepared by a consultant from the County's CEQA Consultant List, which can be found on the County of San Diego's website at: <http://www.sdcounty.ca.gov/luegdocs/PDS%20PROCEDURES/REGULATORY%20PLANNING/REFERENCE%20DOCUMENTS/CEQA%20CONSULTANT%20LIST.pdf>. No list is maintained for hydrology and stormwater management planning. With the exception of minor stormwater management plans, only registered engineers registered in the State of California shall be permitted to submit hydrology/drainage studies and only registered engineers or Certified Professionals in Storm Water Quality certified by CPESC, Inc., or an equivalent entity approved by the Director of Public Works, shall be permitted to submit stormwater management plans.

Applicants are responsible for selecting and direct contracting with specific consultants from the County's list to prepare CEQA documents for private projects. Prior to the first submittal of a CEQA document prepared by a listed consultant for a private project, the applicant, consultant, consultant's firm (if applicable) and County shall execute the



attached Memorandum(s) of Understanding (MOU). The responsibilities of all parties involved in the preparation of environmental documents for the County (i.e. applicant, individual CEQA consultants/sub-consultants, consulting/sub-consultant firms, and County) are clearly established in the MOU for each requested applicable study. The clear identification of roles and responsibilities for all parties is intended to contribute to improved environmental document quality. The MOU can be found on the Department's website at: <http://www.sdcountry.ca.gov/luegdocs/Templates/Boilerplate%20Templates/MOU.doc>.

#### **GUIDELINES FOR DETERMINING SIGNIFICANCE & REPORT FORMAT AND CONTENT REQUIREMENTS**

Technical studies must be prepared using the Guidelines for Determining Significance and Report Format & Content Requirements. The Guidelines and Report Format & Content Requirements can be found on the Department's website at <http://www.co.san-diego.ca.us/PDS/procguid.html> (listed in alphabetical order).

#### **SUBMITTAL REQUIREMENTS**

To assure timely cost-effective processing of your project, all items must be submitted concurrently. The submittal must be made to the PDS Zoning Counter at 5510 Overland Avenue, Suite 110, San Diego, CA 92123. **For fastest service when submitting information requested in this letter, arrive at the PDS Zoning Counter between 8:00 a.m. and 10:00 a.m. Please note that all Public Counters at PDS are closed daily from 11:45 a.m. through 12:30 p.m. Expect longer wait times before and after the lunchtime closure.**

The submittal must include the following items:

1. Submit a copy of this letter.
2. **SUBMIT APPLICATIONS FOR A GENERAL PLAN AMENDMENT, REZONE, MAJOR USE PERMIT AND CERTIFICATE OF COMPLIANCE(S).** Please contact the zoning counter at 858-694-2262 to verify your submittal requirements and schedule an appointment for the submittal of your application(s). Please make the appointment as soon as possible, as the wait time for appointments fluctuates.
3. **SUBMIT A SEPARATE LETTER ADDRESSING EACH ITEM IN THE ATTACHED PROJECT ISSUE CHECKLIST (Attachment A), BY REFERENCE NUMBER.** This letter is required to detail how every unresolved item has been addressed in the resubmittal package.
4. In addition to the applications noted in #2 above, the following information and/or document(s) with the requested number of copies shall be provided.

ALL TECHNICAL STUDIES HAVE NOT  
BEEN SUBMITTED. OK!

Information/Document	# of Copies	CD or Flash Drive with Word and PDF Doc	Document Distribution (For Admin Purposes Only)
Project Issue Checklist Response Letter ✓	3	PDF	Bronwyn Brown (1) Susan Harris (1), LD (1)  Business Rule: Project Issue Checklist Response Letter
Application for a General Plan Amendment ✓ <a href="http://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/for_mfields/ESUB_GPA.pdf">http://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/for_mfields/ESUB_GPA.pdf</a>	*		Bronwyn Brown (1)
Application for a Rezone ✓ <a href="http://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/for_mfields/ESUB_REZONE.pdf">http://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/for_mfields/ESUB_REZONE.pdf</a>	*		Bronwyn Brown (1)
Application for a Major Use Permit ✓ <a href="http://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/for_mfields/ESUB_MUP_STD.pdf">http://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/for_mfields/ESUB_MUP_STD.pdf</a>	*		Bronwyn Brown (1)
Boundary Adjustment with Certificate of Compliance <a href="http://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/for_mfields/ESUB_BA_with_CC.pdf">http://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/for_mfields/ESUB_BA_with_CC.pdf</a>	*		NOT SUBMITTED Bronwyn Brown (1)  ? OK.
Amended Project Description ✓	12	PDF	Bronwyn Brown (1) Susan Harris (1), Air Quality Specialist (1), Biologist (1) Cultural Resources Specialist (1), Hazards Specialist (1), Fire Marshal (1), Scott Rosecrans, DEH (1) Groundwater Geologist (1), Noise Specialist (1),



Information/Document	# of Copies	CD or Flash Drive with Word and PDF Doc	Document Distribution (For Admin Purposes Only)
			LD (1), Boulevard CPG (1)
<b>Plot Plan</b> <ul style="list-style-type: none"> <li>Plans must be folded to 8-1/2 x 11 maximum with the lower right hand corner exposed</li> <li>If multiple pages, sheets must be stapled together.</li> <li>Must include Elevations</li> </ul>	8	PDF	Bronwyn Brown (1), Susan Harris (1), Dave Kahler (1), Fire Marshal (1), DEH (1), LD (1) Noise Specialist (1) Boulevard CPG (1)  Business Rule: Plot Plan
<b>Conceptual Landscape Plan</b> (if staff determines one is required)	3	PDF	Bronwyn Brown (1), Dave Kahler (1) Boulevard CPG (1) Business Rule: Landscape Plans
<b>Preliminary Grading Plan (with Supporting Information)</b>	8	PDF	Bronwyn Brown (1), Susan Harris (1), Dave Kahler (1), Fire Marshal (1), DEH (1), LD (1) Noise Specialist (1) Boulevard CPG (1)  Business Rule: Grading Plan
<b>Planning Analysis</b>	2	1 PDF	Bronwyn Brown (1), Susan Harris (1)
<b>Draft Major Use Permit Findings</b>	2	1 PDF	Bronwyn Brown (1), Susan Harris (1)
<b>Resource Protection Study</b>	2	1 PDF	Bronwyn Brown (1), Susan Harris (1) Business Rule: Resource-Protection-Study)
<b>Visual Impact Analysis - (Include Photometric Study)</b>	2	1 PDF	Bronwyn Brown (1), Susan Harris (1) Business Rule: Visual-Impact-Report

MUP Erosion Control  
Plan

8

Brown (4)  
LD (4)

<b>Information/Document</b>	<b># of Copies</b>	<b>CD or Flash Drive with Word and PDF Doc</b>	<b>Document Distribution</b> <i>(For Admin Purposes Only)</i>
<b>Agricultural Analysis</b>	2	Word & PDF	Bronwyn Brown (1), Agriculture Specialist (1)  Business Rule: Agricultural Study
<b>Air Quality Information/Study</b>	2	Word & PDF	Bronwyn Brown (1), Air Quality Specialist (1)  Business Rule: Air Quality Report
<b>Biological Resources Letter Report/Study</b>	2	Word & PDF	Bronwyn Brown (1), Biologist (1)  Business Rule: Biological-Resource-Report and/or Biological Resource Easement Map and/or Biology Resource (map)
<b>Open Space, Fence and Sign Exhibit</b> (if applicable)	2	PDF	Bronwyn Brown (1), Biologist (1)
<b>Off-Site Mitigation Information</b> (if applicable)	2	PDF	Bronwyn Brown (1), Biologist (1)
<b>Conceptual Resource Management Plan</b>	2	Word & PDF	Bronwyn Brown (1), Biologist (1)
<b>Conceptual Revegetation Plan</b> (if applicable)	3	PDF	Bronwyn Brown (1), Biologist (1), Dave Kahler (1)
<b>Cultural Resource Report</b>	2	Word & PDF	Bronwyn Brown (1), Cultural Resources Specialist (1)  Business Rule: Business Rule: Cultural-Resource-Report
<b>Cultural Resource Report Confidential Appendix</b>	1	1 PDF	Cultural Resources Specialist (1)  Business Rule: Arch Survey Confidential
<b>Additional Hazards Information</b>	2	1 PDF	Bronwyn Brown (1), Hazards Specialist (1)



Information/Document	# of Copies	CD or Flash Drive with Word and PDF Doc	Document Distribution (For Admin Purposes Only)
			Business Rule: Hazardous Materials Information
Fire Protection Plan	3	Word & PDF	Bronwyn Brown (1), Land Development (1) PDS Fire Marshal (1)  Business Rule: Fire Protection Plan
Stormwater Management Plan	3	Word & PDF	Bronwyn Brown (1), Land Development (2) Business Rule: Major –SWMP
Drainage/Flooding Analysis	3 ✓	Word & PDF	Bronwyn Brown (1), Land Development (2) Business Rule: Hydrology
Groundwater Investigation	2	Word & PDF	Bronwyn Brown (1), Groundwater Geologist (1) Business Rule: Groundwater Report
Noise Analysis	2	Word & PDF	Bronwyn Brown (1), Noise Specialist (1) Business Rule: Acoustical/Noise Report
Climate Change Analysis/Information	2	Word & PDF	Bronwyn Brown (1), GHG Specialist (1)  Business Rule: Climate Change Analysis
Geologic Investigation/Reconnaissance Report	2	Word & PDF	Bronwyn Brown (1), Groundwater Geologist (1)
Mineral Resource Investigation Report	2	Word & PDF	Bronwyn Brown (1), Groundwater Geologist (1)
Traffic Impact Analysis	3	Word & PDF	Bronwyn Brown (1), Land Development (2) Business Rule: Traffic-Impact
Airport Hazards Study	3	Word & PDF	Bronwyn Brown (1) Airport Specialist (1)

Information/Document	# of Copies	CD or Flash Drive with Word and PDF Doc	Document Distribution (For Admin Purposes Only)
			San Diego County Airport Authority (1)
<b>Solar Photovoltaic Glint and Glare Study</b>	3	Word & PDF	Bronwyn Brown (1) Airport Specialist (1) San Diego County Airport Authority (1)
<b>Completed FAA Form 7460-1</b> (Copy of form and FAA Determination) (Provide proof of completed Aeronautical Studies from the FAA)	2	PDF	Bronwyn Brown (1) Airport Specialist (1) Business Rule: FAA FORM 7460-1
<b>Draft Decommissioning Plan</b>	3	Word & PDF	Bronwyn Brown (1), Land Development (1) PDS Fire Marshal (1)  Business Rule::
<b>Legal Lot Information APN 661-010-02</b>	✓ 2	PDF	Bronwyn Brown (1), Land Development (1)
<b>Title Reports (Confirming Legal Access for all legal lots)</b>	✓ 2	PDF	Bronwyn Brown (1), Land Development (1)
<b>Memorandum(s) of Understanding according to Attachment C</b>	16 Subject Areas (1 Copy each)	PDF	Bronwyn Brown (1) Business Rule: MOU
<b>Owner of Property Authorization</b>	✓ 1	PDF	Bronwyn Brown (1)
<b>Site Photographs</b> (including existing structures)	1	PDF	Bronwyn Brown (1) Hazards Specialist (1)
The staff turnaround goal for review of the requested information/document is 30 days.			



January 30, 2018

Accept check for  
\$42,649.00

## 5. Deposits:

TRUST ACCOUNT ID#: 2081172-D 05265	
DEPARTMENT	DEPOSIT AMOUNT
PDS	\$50,178.00
DEH	\$1,434.00
<b>TOTAL DEPOSITS:</b>	<b>\$51,612.00</b>

\* Refer to the attached "Estimate of Discretionary Processing Time and Cost" for a complete estimate of project costs through hearing /decision.

If you choose not to proceed with the project and you would like to request a refund of any remaining funds in your account, you may contact the Developer Deposit Hotline at 858-694-2320 or via e-mail at [DeveloperDeposits.CustomerService@sdcounty.ca.gov](mailto:DeveloperDeposits.CustomerService@sdcounty.ca.gov). Please note that deposit funds may have been fully expended and a refund may not be processed until all work on the project is complete and the project file is closed.

**PRE-APP EXPIRATION DATE**

In order to maintain adequate progress in processing of your project, the PDS requires that all of the revisions/information requested in this letter be submitted in conformance with the above submittal requirements by **June 22, 2018**. Please note that an extension of this date may be granted at the discretion of the Director of the PDS, however changes in circumstance may occur that render the direction in this letter outdated, incomplete or incorrect. To request an extension, submit a written request, signed and dated by the project applicant. The request must include the proposed new submittal date and a brief reasoning for the extension request. If the revised document(s) are not received, or an approved extension request is not granted by the Director by the above date, the information requested in this letter will not be accepted and a new pre-application may be needed to provide current submittal requirements.

If you have any questions or need additional information, please contact me at (858) 495-5516 or at [Bronwyn.Brown@sdcounty.ca.gov](mailto:Bronwyn.Brown@sdcounty.ca.gov).

Sincerely,



Bronwyn Brown, Project Manager

Project Planning Division

## cc:

Pat Brown, 17901 Von Karman Ave, #1050 Irvine, CA 92614  
David Hochart, 605 Third Street, Encinitas, CA, 92024

## email cc:

Benjamin Mills, Planning Manager, PDS  
Bronwyn Brown, Project Manager, PDS  
Jacumba Community Planning Group

**SCOPING LETTER MATRIX**

Attachment	Item
<b>A</b>	<b>Project Issue Checklist</b>
<b>B</b>	Estimate of Discretionary Processing Time and Cost
<b>C</b>	Memorandums of Understanding
<b>D</b>	Scope for Visual Resources & Aesthetics
<b>E</b>	Scope for Agricultural Resources
<b>F</b>	Scope for Air Quality Analysis
<b>G</b>	Scope of Biological Resources Report/Letter Report
<b>H</b>	Scope for Cultural Resources
<b>I</b>	Paleontological Resources Conditions
<b>J</b>	Scope for Geologic Investigation/Reconnaissance Report
<b>K</b>	Scope for Phase I Environmental Site Assessment
<b>L</b>	Scope for Fire Protection Plan
<b>M</b>	Scope for Groundwater Resources
<b>N</b>	Scope for Mineral Resources
<b>O</b>	Scope for Noise Issues
<b>P</b>	Scope for Climate Change
<b>Q</b>	Federal Aviation Administration (FAA) Notice of Proposed Construction or Alteration



**ATTACHMENT A**  
***PROJECT ISSUE CHECKLIST***

The Project Issue Checklist that follows details the specific changes and comments that are required to proceed with your project application. This checklist will be used throughout the process to track requests for information and satisfaction of project requirements.

Please note that the resubmittal of requested information must be accompanied by a separate letter addressing each item in the Project Issue Checklist. The letter must explain in detail how the comment was addressed and where (e.g. in what documents, where on the map/plot plan, etc.). County staff will use this letter to verify whether each comment in the checklist has been adequately addressed. If you have any questions about any of the comments in the checklist, please contact your project manager.

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 4		Major Project Issue	<b>Visual Resources:</b> Based on an initial review, it appears that proposed project may adversely affect visual resources. Views from scenic vistas, scenic highways and County Scenic Routes will need to be analyzed further to determine the extent of any adverse impacts. Visual resources can include narrow or expansive views, views from one site or from a series of sites as along a scenic highway and views above, at eye level, or from below. A Visual Resources Study is required. The report should identify changes/modifications of the project from the original and provide mitigation and design considerations to reduce the visual impacts associated with this project. The recommended mitigation and design considerations should be incorporated into the project design.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
	Major Project Issue	<p><b>Cultural Resources:</b> A cultural resources constraints analysis was completed by Dudek for the proposed project titled "Cultural Resources Constraints Analysis for the Jacumba Valley Ranch Solar Project, San Diego County, California." (November 2017). The constraints analysis consisted of a cultural records search that identified numerous cultural resources within the proposed project area. These resources include individual archaeological sites and the Jacumba Valley Archaeological District (JVAD). The JVAD has been determined eligible for listing in the National Register of Historic Places (NRHP); therefore, it is considered a significant resource under CEQA.</p> <p><b>Major Project Issue:</b> The current design of the proposed project may result in unmitigable significant impacts to cultural resources. Re-design is recommended to avoid any significant resources that are identified in the required cultural studies. As discussed in the constraints analysis, it should be noted that if any federal permits are required for the project, then Section 106 of the National Historic Preservation Act (NHPA) and consultation with the State Historic Preservation Officer regarding project effects to the district would also apply.</p>		1/29/18	
	Major Project Issue	The project site contains wetlands and jurisdictional waters of the U.S./State, which are subject to the Resource Protection Ordinance (RPO) and permitting requirements of federal and state authorizing agencies as outlined below. The Resource Protection Ordinance prohibits impacts to RPO wetlands and wetland buffers as described in Attachment G.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

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	Major Project Issue	<b>Fire Services Agreement:</b> This project, along with all other development, has a cumulative impact on the emergency services for this community. Also: Due to the unique nature of the proposed project, additional equipment/staff/training will likely be necessary. To mitigate for this impact, the project will be required to participate in an emergency services agreement with the San Diego County Fire Authority. Please see project issue checklist for additional fire comments.		1/29/18	
3- 1	Project Description	The project will require a General Plan Amendment, Rezone, Major Use Permit and a Certificate of Compliance. Please outline within project description and provide a discussion on the proposed changes of removing and replacing the Specific Plan Land Use Designation and Zoning with a compatible land use designation and zone.		1/29/18	
3- 2	Project Description	Provide a table highlighting all APN's and identifying the existing and proposed Land Use Designation and Zoning.		1/29/18	
3- 3	Project Description	Please provide a project history outlining previous approvals including the GPA designations and previously certified EIR.		1/29/18	
3- 4	Project Description	Please provide a table summary outlining the project specific components. Please quantify and identify total square footage and dimensions for each structure.		1/29/18	
3- 5	Project Description	Include detailed information about the required grading for this project. Additionally please clarify if the proposed grading will be performed in phases and if so, show the limits of grading associated with each phase on the plans.		1/29/18	
3- 6	Project Description	Provide information about the typical schedule of construction and the type of equipment used for both construction and maintenance purposes. Clarify if any construction activity is expected to occur during weekends or outside typical work hours. This will help us identify any additional impacts such as noise levels or specific impacts to the existing road systems based on the type of equipment required for construction and maintenance that need to be analyzed during discretionary review.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 7	Project Description	The project description will need to be expanded to include the Operation and Maintenance component for this project with the number of Average Daily Trips (ADT), in order to document if there are any direct impacts to the roadway network generated from the implementation of this project. Cumulative impacts will be mitigated by payment of the Transportation Impact Fee (TIF).		1/29/18	
3- 8	Project Description	Update total amount of water to be used for construction and operation and maintenance.		1/29/18	
3- 9	Project Description	Private Road Standards are a minimum twenty-eight foot (28') graded width with twenty-four foot (24') improved width. Please update to include the graded width and improved width for the proposed access roads.		1/29/18	
3- 10	Project Description	The proposed energy storage has two options of spreading 20 self contained steel containers around the project site or being centrally located next to the proposed O&M Building. Please update project description to decide which option is being chosen or alternatively update Plot Plan to show both options.		1/29/18	
3- 11	Project Description	Pending additional comments in this letter, the project description should be updated to reflect the most current project description.		1/29/18	
4- 1	General Plan Conformance	The project is required to conform to the County of San Diego General Plan and the Mountain Empire Subregional Plan Goals and Policies. Please provide a Planning Analysis. A project analysis of each applicable goal and policy is required. An analysis of the Community Development Model is required to show consistency with the County of San Diego General Plan. The following General Plan and Community Plan Policies are applicable:		1/29/18	
4- 2	General Plan Conformance	<b>Policy LU-2.8 Mitigation of Development Impacts.</b> Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment, and/or are detrimental to human health and safety.		1/29/18	

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**PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016		
Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 3	General Plan Conformance	<b>Policy LU-5.3: Rural Land Preservation.</b> Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations.		1/29/18	
4- 4	General Plan Conformance	<b>Policy LU-5.5: Projects that Impede Non-Motorized Travel.</b> Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented.		1/29/18	
4- 5	General Plan Conformance	<b>Policy LU-6.1 Environmental Sustainability.</b> Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment		1/29/18	
4- 6	General Plan Conformance	<b>Policy LU-6.5 Sustainable Stormwater Management.</b> Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.		1/29/18	
4- 7	General Plan Conformance	<b>LU-6.6: Integration of Natural Features into Project Design.</b> Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.		1/29/18	
4- 8	General Plan Conformance	<b>Policy LU-6.9: Development Conformance with Topography.</b> Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.		1/29/18	
4- 9	General Plan Conformance	<b>Policy LU-6.10: Protection from Hazards.</b> Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

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4- 10	General Plan Conformance	<b>Policy LU-8.2: Groundwater Resources.</b> Require development to identify adequate groundwater resources in groundwater-dependent areas, as follows: <ul style="list-style-type: none"> <li>• In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions.</li> <li>• Encourage programs to alleviate overdraft conditions in Boulevard.</li> <li>• In areas without current overdraft groundwater conditions, prohibit new groundwater-dependent development where overdraft conditions are foreseeable.</li> </ul>		1/29/18	
4- 11	General Plan Conformance	<b>Policy LU-8.3: Groundwater Dependent Habitat.</b> Discourage development that would significantly draw down the groundwater table to the detriment of groundwater-dependent habitat, except in the Borrego Valley.		1/29/18	
4- 12	General Plan Conformance	<b>Policy LU-10.2: Development-Environmental Resource Relationship.</b> Require development in semi-rural and rural areas to respect and conserve the unique natural features and rural character and avoid sensitive or intact environmental resources and hazard areas.		1/29/18	
4- 13	General Plan Conformance	<b>Policy LU-12.1: Concurrency of Infrastructure and Services with Development.</b> Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.		1/29/18	
4- 14	General Plan Conformance	<b>Policy LU-12.2: Maintenance of Adequate Services.</b> Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved Level of Service (LOS) but do not achieve a LOS of D or better.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 15		General Plan Conformance	<b>Policy LU-13.2: Commitment of Water Supply.</b> Require new development to identify adequate water resources, in accordance with state law, to support the development prior to approval.		1/29/18	
4- 16		General Plan Conformance	<b>Policy M-3.3 Multiple Ingress and Egress.</b> Require development to provide multiple ingress/egress routes in conformance with State law, and local regulations.		1/29/18	
4- 17		General Plan Conformance	<b>Policy M-4.4 Accommodate Emergency Vehicles.</b> Design and construct public and private roads to allow for necessary access for appropriately sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.		1/29/18	
4- 18		General Plan Conformance	<b>Policy M-10.7 Parking Area Design for Stormwater Runoff.</b> Require that parking areas be designed to reduce pollutant discharge and stormwater runoff through site design techniques such as permeable paving, landscaped infiltration areas, and unpaved but reinforced overflow parking areas that increase infiltration. Require parking areas located within or adjacent to preserve areas to also include native landscaping and shielded lighting.		1/29/18	
4- 19		General Plan Conformance	<b>Policy COS-2.2 Habitat Protection through Site Design.</b> Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.		1/29/18	
4- 20		General Plan Conformance	<b>Policy COS-3.1 Wetland Protection.</b> Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.		1/29/18	



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PROJECT ISSUE CHECKLIST**

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 21	General Plan Conformance	<b>Policy COS-3.2: Minimize Impacts of Development.</b> Require development projects to: • Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and • Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.		1/29/18	
4- 22	General Plan Conformance	<b>Policy COS-4.1 Water Conservation.</b> Require development to reduce the waste of potable water through use of efficient technologies and conservation efforts that minimize the County's dependence on imported water and conserve groundwater resources.		1/29/18	
4- 23	General Plan Conformance	<b>COS-4.2 Drought-Efficient Landscaping.</b> Require efficient irrigation systems and in new development encourage the use of native plant species and non-invasive drought tolerant/low water use plants in landscaping.		1/29/18	
4- 24	General Plan Conformance	<b>Policy COS-5.1 Impact to Floodways and Floodplains.</b> Restrict development in floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element. Development in floodways and floodplains has the potential to alter natural hydrologic flow and cause soil erosion and increased stormwater runoff—including loss of wetland and health issues related to surface and groundwater contamination. <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>		1/29/18	
4- 25	General Plan Conformance	<b>Policy COS-5.2 Impervious Surfaces.</b> Require development to minimize the use of directly connected impervious surfaces and to retain stormwater run-off caused from the development footprint at or near the site of generation.		1/29/18	

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PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016		
Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 26	General Plan Conformance	<b>Policy COS-5.3 Downslope Protection.</b> Require development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources.		1/29/18	
4- 27	General Plan Conformance	<b>Policy COS-5.5 Impacts of Development to Water Quality.</b> Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.		1/29/18	
4- 28	General Plan Conformance	<b>Policy COS-7.1 Archaeological Protection.</b> Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.		1/29/18	
4- 29	General Plan Conformance	<b>Policy COS-7.3 Archaeological Collections.</b> Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.		1/29/18	
4- 30	General Plan Conformance	<b>Policy COS-9.1 Preservation.</b> Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes.		1/29/18	
4- 31	General Plan Conformance	<b>Policy COS-9.2 Impacts of Development.</b> Require development to minimize impacts to unique geological features from human related destruction, damage, or loss.		1/29/18	
4- 32	General Plan Conformance	<b>Policy COS-11.1: Protection of Scenic Resources.</b> Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 33	General Plan Conformance	<b>Policy COS-11.3: Development Siting and Design.</b> Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following: <ul style="list-style-type: none"> <li>• Creative site planning</li> <li>• Integration of natural features into the project</li> <li>• Appropriate scale, materials, and design to complement the surrounding natural landscape</li> <li>• Minimal disturbance of topography</li> <li>• Clustering of development so as to preserve a balance of open space vistas, natural features, and community character.</li> <li>• Creation of contiguous open space networks</li> </ul>		1/29/18	
4- 34	General Plan Conformance	<b>COS-13.1 Restrict Light and Glare.</b> Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.		1/29/18	
4- 35	General Plan Conformance	<b>Policy COS-14.7: Alternative Energy Sources for Development Projects.</b> Encourage development projects that use energy recovery, photovoltaic, and wind energy.		1/29/18	
4- 36	General Plan Conformance	<b>COS-14.8 Minimize Air Pollution.</b> Minimize land use conflicts that expose people to significant amounts of air pollutants.		1/29/18	
4- 37	General Plan Conformance	<b>Policy COS-14.9: Significant Producers of Air Pollutants.</b> Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.		1/29/18	
4- 38	General Plan Conformance	<b>Policy COS-14.10: Low-Emission Construction Vehicles and Equipment.</b> Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

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Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 39	General Plan Conformance	<b>Policy COS-14.11 Native Vegetation.</b> Require development to minimize the vegetation management of native vegetation while ensuring sufficient clearing is provided for fire control.		1/29/18	
4- 40	General Plan Conformance	<b>Policy COS-15.6: Design and Construction Methods.</b> Require development design and construction methods to minimize impacts to air quality.		1/29/18	
4- 41	General Plan Conformance	<b>Policy COS-17.2 Construction and Demolition Waste.</b> Require recycling, reduction and reuse of construction and demolition debris.		1/29/18	
4- 42	General Plan Conformance	<b>Policy COS-18.1: Alternate Energy Systems Design.</b> Work with San Diego Gas and Electric and non-utility developers to facilitate the development of alternative energy systems that are located and designed to maintain the character of their setting.		1/29/18	
4- 43	General Plan Conformance	<b>Policy S-3.1 Defensible Development.</b> Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.		1/29/18	
4- 44	General Plan Conformance	<b>Policy S-3.3 Minimize Flammable Vegetation.</b> Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.		1/29/18	
4- 45	General Plan Conformance	<b>Policy S-3.6 Fire Protection Measures.</b> Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.		1/29/18	
4- 46	General Plan Conformance	<b>Policy S-3.7: Fire Resistant Construction.</b> Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire threat areas.		1/29/18	
4- 47	General Plan Conformance	<b>Policy S-6.1: Water Supply.</b> Ensure that water supply systems for development are adequate to combat structural and wildland fires.		1/29/18	



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**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

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4- 48	General Plan Conformance	<b>Policy S-6.3: Funding Fire Protection Services.</b> Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.		1/29/18	
4- 49	General Plan Conformance	<b>Policy S-7.1 Development Location.</b> Locate development in areas where the risk to people or resources is minimized. In accordance with the California Department of Conservation Special Publication 42, require development be located a minimum of 50 feet from active or potentially active faults, unless an alternative setback distance is approved based on geologic analysis and feasible engineering design measures adequate to demonstrate that the fault rupture hazard would be avoided.		1/29/18	
4- 50	General Plan Conformance	<b>Policy S-9.2: Development in Floodplains.</b> Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.		1/29/18	
4- 51	General Plan Conformance	<b>Policy S-10.4 Stormwater Management.</b> Require development to incorporate low impact design, hydromodification management, and other measures to minimize stormwater impacts on drainage and flood control facilities.		1/29/18	
4- 52	General Plan Conformance	<b>Policy S-10.5 Development Site Improvements.</b> Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.	Ongoing	1/29/18	
4- 53	General Plan Conformance	<b>Policy S-11.5 Development Adjacent to Agricultural Operations.</b> Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.	Ongoing	1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 54		General Plan Conformance	<b>Policy N-1.1: Noise Compatibility Guidelines.</b> Use the Noise Compatibility Guidelines (Table N-1) and the Noise Standards (Table N-2) as a guide in determining the acceptability of exterior and interior noise for proposed land uses.		1/29/18	
4- 55		General Plan Conformance	<b>Policy N-1.2: Noise Management Strategies.</b> Require the following strategies as higher priorities than construction of conventional noise barriers where noise abatement is necessary: o Avoid placement of noise sensitive uses within noisy areas o Increase setbacks between noise generators and noise sensitive uses o Orient buildings such that the noise sensitive portions of a project are shielded from noise sources o Use sound-attenuating architectural design and building features o Employ technologies when appropriate that reduce noise generation (i.e. alternative pavement materials on roadways)		1/29/18	
4- 56		General Plan Conformance	<b>Policy N-2.1 Development Impacts to Noise Sensitive Land Uses.</b> Require an acoustical study to identify inappropriate noise level where development may directly result in any existing or future noise sensitive land uses being subject to noise levels equal to or greater than 60 CNEL and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2		1/29/18	
4- 57		General Plan Conformance	<b>Policy N-3.1: Groundborne Vibration.</b> Use the Federal Transit Administration and Federal Railroad Administration guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains, construction equipment, and other sources.		1/29/18	
4- 58		General Plan Conformance	<b>Policy N-4.1: Traffic Noise.</b> Require that projects proposing General Plan amendments that increase the average daily traffic beyond what is anticipated in this General Plan do not increase cumulative traffic noise to off-site noise sensitive land uses beyond acceptable levels.		1/29/18	
4- 59		General Plan Conformance	<b>Policy N-6.2 Recurring Intermittent Noise.</b> Minimize impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in Table N-2		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 60	General Plan Conformance	<b>Policy N-6.4 Hours of Construction.</b> Require development to limit the hours of operation as appropriate for non-emergency construction and maintenance.		1/29/18	
4- 61	General Plan Conformance	<b>Policy M-2.3 Environmentally Sensitive Road Design.</b> Locate and design public and private roads to minimize impacts to significant biological and other environmental and visual resources. Avoid road alignments through floodplains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. Design new roads to maintain wildlife movement and retrofit existing roads for that purpose. Utilize fencing to reduce road kill and to direct animals to under crossings.		1/29/18	
4- 62	General Plan Conformance	<b>Policy S-9 Protection of Life and Property.</b> Minimized personal injury and property damage losses resulting from flood events.		1/29/18	
4- 63	General Plan Conformance	<b>Policy S-9.2 Development in Floodplains.</b> Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction. <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>		1/29/18	
4- 64	General Plan Conformance	<b>Policy S-9.3 Development in Flood Hazard Areas.</b> Require development within mapped flood hazard areas be sited and designed to minimize on and off-site hazards to health, safety, and property due to flooding. <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR		Project Number(s): PDS2017-MPA-17-016			
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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 65	General Plan Conformance	<p><b>Policy S-9.5 Development in Semi-Rural and Rural Lands within the Floodplain Fringe.</b> Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.</p> <p><u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u></p>		1/29/18	
4- 66	General Plan Conformance	<p><b>Policy S-10 Floodway and Floodplain Capacity.</b> Floodways and floodplains that have acceptable capacity to accommodate flood events.</p> <p><u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u></p>		1/29/18	
4- 67	General Plan Conformance	<p><b>Policy S-10.1 Land Uses within Floodways.</b> Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.</p> <p><u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u></p>		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 68	General Plan Conformance	<b>Policy S-10.2 Use of Natural Channels.</b> Require the use of natural channels for County flood control facilities except where necessary to protect existing structures from a current flooding problem and where natural channel use is deemed infeasible. The alternative must achieve the same level of biological and other environmental protection, such as water quality, hydrology, and public safety.  <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>		1/29/18	
4- 69	General Plan Conformance	<b>Policy S-10.3 Flood Control Facilities.</b> Require flood control facilities to be adequately sized, constructed, and maintained to operate effectively.  <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>		1/29/18	
4- 70	General Plan Conformance	<b>Policy S-10.4 Stormwater Management.</b> Require development to incorporate low impact design, Hydromodification management, and other measures to minimize stormwater impacts on drainage and flood control facilities.  <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>		1/29/18	
4- 71	General Plan Conformance	<b>Policy S-10.5 Development Site Improvements.</b> Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.  <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016		
Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 72	General Plan Conformance	<b>Policy S-10.6 Stormwater Hydrology.</b> Ensure development avoids diverting drainages, increasing velocities, and altering flow rates to off-site areas to minimize adverse impacts to the area's existing hydrology. Increases in velocities and peak flow rates can result in flooding, erosion, and other problems downstream. Decreases can deprive biological resources of a needed water source.  <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>		1/29/18	
4- 73	General Plan Conformance	<b>Policy S-15.1 Land Use Compatibility.</b> Require land uses surrounding airports to be compatible with the operation of each airport.		1/29/18	
4- 74	General Plan Conformance	<b>Policy S-15.3 Hazardous Obstructions within Airport Approach and Departure.</b> Restrict development of potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas or known flight patterns and discourage uses that may impact airport operations or do not meet Federal or State aviation standards		1/29/18	
5- 1	Mountain Empire Subregional Plan	<b>Land Use (Policy and Recommendation 1).</b> The landforms of the Subregion are an important environmental resource that should be respected in new development. Hillside grading shall be minimized and designed to blend in with the existing natural contours.		1/29/18	
5- 2	Mountain Empire Subregional Plan	<b>Land Use (Policy and Recommendation 2).</b> Create a buffer area of one hundred and fifty (150) feet in width along the international boundary line inclusive of the existing sixty-foot (60') Public Reserve owned by the Federal Government.		1/29/18	
5- 3	Mountain Empire Subregional Plan	<b>Land Use (Policy and Recommendation 3).</b> Apply a ninety (90') foot setback within which no new permanent building may be built northerly of the existing sixty (60') foot Public Reserve line. Where such ninety (90') foot setback can be shown to adversely impact a property, owner may apply for a waiver from complying with the setback as provided for Section 7060 of The Zoning Ordinance.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5-4	Mountain Empire Subregional Plan	<b>Land Use (Policy and Recommendation 4).</b> Ensure that all development be planned in a manner that provides adequate public facilities prior to or concurrent with need.		1/29/18	
5-5	Mountain Empire Subregional Plan	<b>Energy Conservation (Policy and Recommendation 8.1).</b> New development should utilize alternative energy technologies, especially active and passive solar energy systems.		1/29/18	
5-6	Mountain Empire Subregional Plan	<b>Public Facilities and Services (Policy and Recommendation 5.4).</b> Uses proposed for the property adjacent to substations or transmission line rights-of-ways should be reviewed for possible impacts to the power facilities and vice versa.		1/29/18	
5-7	Mountain Empire Subregional Plan	<b>Environmental Resources (Policy and Recommendation 1).</b> All development shall demonstrate a diligent effort to retain as many native oak trees as possible.		1/29/18	
5-8	Mountain Empire Subregional Plan	<b>Environmental Resources (Policy and Recommendation 4).</b> The dark night sky is a significant resource for the Subregion and appropriate steps shall be taken to preserve it.		1/29/18	
5-9	Mountain Empire Subregional Plan	<b>Environmental Resources (Policy and Recommendation 5).</b> Development shall not adversely affect the habitat of sensitive plant and wildlife species or those areas of significant scenic value.		1/29/18	
7-1	Zoning Ordinance	Zoning for the site is zoned General Rural (S92), Open Space (S80), and Specific Plan (S88). A Rezone is required to remove and replace the Specific Plan zoning designator.	Informational Only	1/29/18	N/A
7-2	Zoning Ordinance	Provide an explanation within the project description if an exemption to Section 4620g. of the Z.O. is required. Please outline proposed height.		1/29/18	
7-3	Zoning Ordinance	Provide an explanation within the project description if an exemption to Section 4813 of the Z.O. is required.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016		
Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
8- 1	Board Policies	The following County Board of Supervisors Land Use Policies apply to this project: I-17 (Right-of-Way Dedication and Public Improvement Requirements in Connection with Zone reclassifications), I-18 (Right-of-Way Dedication and Public Improvement Requirements in Connection with Major and Minor Use Permits), I-63 (General Plan Amendment Initial Review), I-68 (Proposed Projects in Flood Plains with Defined Floodways),	Informational Only	1/29/18	N/A
8- 2	Board Policies	The project is subject to Board Policy- I-111 (Land Use Policy for Discretionary Permits Adjacent to the International Border) - Provide a response on how the project is consistent with the policy findings.		1/29/18	
9- 1	Applications	Please submit a General Plan Amendment.		1/29/18	
9- 2	Applications	Please submit a Rezone Application. Additionally, A Rezone to change the Specific Plan Zoning is also required		1/29/18	
9- 3	Applications	Please submit a Major Use Permit. A solar farm project is considered a Major Impact Services and Utilities and will require a Major Use Permit.		1/29/18	
9- 4	Applications	Please submit a Certificate of Compliance for the following APN's: In order to comply with the Subdivision Ordinance, the applicant must complete a Certificate of Compliance to merge the following APN(s) 661-010-26-00, 661-010-27-00 and 661-010-30-00 together. In order for 661-060-12-00 to be considered legal, there are two options: a. Option #1: Merge 661-060-12 in the same Certificate of Compliance as 661-010-26, 661-010-27 to create one legal lot. b. Option #2: File a separate certificate of compliance to make 661-060-12 legal.		1/29/18	
10- 1	Plot Plan	Please provide a plot plan with the minimum plot plan requirements as specified in Form PDS-090. <a href="http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/pds090.pdf">http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/pds090.pdf</a> Additional details are required for staff's review. Pending resubmittal of a Plot Plan additional comments may be required.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
10- 2	Plot Plan	As part of the plot plan package, please include elevations of all structures (proposed transmission towers, signage, battery storage containers) and update building elevations to show lighting, color, building materials, accessory equipment.		1/29/18	
10- 3	Plot Plan	Provide building coverage/square footage/acres/footprint table outlining the proposed changes from what was originally approved. (Including temporary access roads, size of proposed substation, O&M building, temporary staging, parking and laydown area)		1/29/18	
10- 4	Plot Plan	Provide a Floor Plan of the proposed battery storage building with details regarding the location and arrangement of the batteries and other associated equipment.		1/29/18	
10- 5	Plot Plan	Identify location and acres/square feet of temporary staging/storage areas for equipment and trucks during construction.		1/29/18	
10- 6	Plot Plan	Pending comments from the San Diego County Airport Authority Land Use Commission, possible re-design maybe required. Please update accordingly.		1/29/18	
10- 7	Plot Plan	Please include all existing and proposed structures (Existing wells) on plot plan. Identify which ones will be used by the proposed project.		1/29/18	
10- 8	Plot Plan	How many temporary access roads are proposed? Will these temporary access roads be included as part of the revegetation plan? Show location, areas of disturbance, and access points.		1/29/18	
10- 9	Plot Plan	Please provide all existing easements.		1/29/18	
10- 10	Plot Plan	Please delineate all setbacks on Plot Plan.		1/29/18	
10- 12	Plot Plan	Update Plot Plan with a Best Management Practices (BMP) sheet.		1/29/18	
10- 13	Plot Plan	Delineate any existing septic on-site.		1/29/18	
10- 14	Plot Plan	Provide a detail and cross section of the proposed access roads that delineate proposed transmission line and any existing/proposed easements.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016		
Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
10- 15	Plot Plan	Update call-outs with "proposed" (i.e. "proposed" energy storage building).		1/29/18	
10- 16	Plot Plan	Update Plot Plan to include locations of proposed fencing. Note: Parking Area: All parking areas of 5 or more parking spaces, (and driveways serving such parking areas) located on parcels abutting property in any residential zone shall be separated from such abutting property by a solid fence or wall 72 inches in height. Provide detail on parking area and proposed fencing.		1/29/18	
10- 17	Plot Plan	Provide a sheet showing a close-up of the proposed storage facility and associated equipment.		1/29/18	
10- 18	Plot Plan	Provide specifications and details of the proposed batteries.		1/29/18	
10- 19	Plot Plan	Gate Entry - it is not clear where the proposed gate is being located nor is it clear if the proposed gate is located within a private road easement. Please update to include.		1/29/18	
10- 20	Plot Plan	Update plot plan package to include proposed staging areas. Outline size of staging area(s).		1/29/18	
10- 21	Plot Plan	The proposed energy storage has two options of spreading 20 self contained steel containers around the project site or being centrally located next to the proposed O&M Building. Please update project description to decide which option is being chosen or alternatively update Plot Plan to show both options.		1/29/18	
10- 22	Plot Plan	Provide a sheet identifying the existing different land use designation and zoning and the proposed changes to land use designation and zoning. Please overlay project over this map.		1/29/18	
11- 1	Preliminary Grading Plan	Please provide a Preliminary Grading Plan. Pending submittal additional comments may be required.		1/29/18	
12- 1	Landscape	Provide a conceptual landscape plan will be required. Comments will be forwarded once received.		1/29/18	
13- 1	Evidence of Legal Lot	APN: 661-010-02-00 – Provide a grant deed prior to 1972.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
14-1	Visual Resources	A Visual Resources Study is required. See Attachment D For Scoping Requirements.		1/29/18	
15-1	Agricultural Resources	An Agricultural Analysis is required. See Attachment E Scoping Requirements.		1/29/18	
16-1	Air Quality	An Air Quality Analysis/Report is required. Please Attachment F for Scoping Requirements.		1/29/18	
17-1	Biological Resources	A Biological Resources Report is required. Please see Attachment G For Scoping Requirements.		1/29/18	
18-1	Cultural Resources	A Cultural Resources Report is required. Please see Attachment H For Scoping Requirements.		1/29/18	
19-1	Paleontological Resources	Please see Attachment I for Paleontological Resource Requirements.		1/29/18	
20-1	Geologic Hazards	A Geologic Investigation/Reconnaissance Report is required. Please see Attachment J For Scoping Requirements		1/29/18	
21-1	Climate Change/Green House Gas Analysis	A Climate Change/Green House Gas Analysis is required. Please see Attachment P for Scoping Requirements		1/29/18	
22-1	Flood Analysis	Once a Drainage and Flood Analysis has been submitted. This will be routed to DPW for their review.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016		
Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
23- 1	Hazards	Based on the information provided, the applicant would be required to prepare a Hazardous Materials Business Plan (HMBP) shall be prepared. This will be a condition of the project, and would be required prior to occupancy. The HMBP would be reviewed by the County's Department of Environmental Health Department. For more information regarding HMBP, see the following link: <a href="http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat.html">http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat.html</a>	Information Only	1/29/18	N/A
23- 2	Hazards	<p>A review of the project site by a County Hazards Specialist indicates that the site may have been subject to a release of hazardous substances that could represent a hazard to the public or the environment.</p> <p>Specifically, a review of aerial photos of the project site and a search of government agency hazardous materials databases indicates:</p> <ul style="list-style-type: none"><li>• Historic agricultural use</li><li>• Potential storage of chemicals</li></ul> <p>Based on these observations, a Phase I Environmental Site Assessment (ESA) must be completed for the subject parcel. If a Phase I ESA or other site assessment was completed previously (within the last three years), submittal of that study may satisfy this requirement.</p> <p>If the submitted Phase I ESA indicates that potentially hazardous conditions exist onsite, further soil testing associated with a Limited Phase II ESA will be required to identify whether site conditions represent a human health or environmental hazard. See Attachment K for Scoping Requirements.</p>		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
24- 1	Fire	A Fire Protection Plan—Full Report shall be provided and be formatted per the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements—Wildland Fire and Fire Protection. Please see Attachment L for Scoping Requirements.		1/29/18	
24- 2	Fire	This project, along with all other development, has a cumulative impact on the emergency services for this community. To mitigate for this impact, the project will be conditioned to enter into a Developer Agreement with the SDCFA.		1/29/18	
Please contact James Pine should you have any questions regarding these comments: (858) 495-5434 or james.pine@sdcounty.ca.gov.					
25- 1	Groundwater Resources	A Groundwater Investigation Report is required. Please see Attachment M For Scoping Requirements. Comments will be forwarded once received.		1/29/18	
25- 1	Solar Photovoltaic Glint and Glare Study	Glare is a continuous source of excessive brightness. It could be experienced by a stationary observer located in the path of reflected sunlight from the face of a solar panel. Glint is a momentary flash of light. This may be produced as a direct reflection of the sun in a solar panel. Glint could be experienced by an observer passing a solar panel at speed, such as a motorist/pilot. Please Provide a Glint and Glare Assessment.		1/29/18	
26- 1	Mineral Resources	Please provide a Minerals Resources Investigation Report. See Attachment N for Scoping Requirements.		1/29/18	
27- 1	Noise	A Noise Analysis/Report is required. See Attachment O for Scoping Requirements.		1/29/18	
28- 1	Resource Protection Study	Please provide a Resource Protection Study.		1/29/18	
29- 1	Trails	No requirements.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
30-	1	SDGE Comments	Please submit written confirmation from SDG&E that the proposed project and associated improvements are compatible with their existing easements/transmission corridor. Please note that Vehicle access shall be provided at all times (24 hours a day) to SDG&E existing facilities, and SDG&E service locks shall be required on all gates adjacent to the power line easement. Finally, please have SDG&E confirm that the proposed project has been designed in accordance with their Transmission Encroachment Guidelines.		1/29/18	
31-	1	Department of Homeland Security Review	The Department of Homeland Security/Border Patrol has been notified of this proposed project. Any comments received will be sent to the applicant. The applicant should coordinate directly with the Department of Homeland Security/Border Patrol to address any design or access concerns they may have.		1/29/18	
32-	1	Jacumba (ALUCP) Airport Land Use Compatibility Plan	Please see Attachment Q for Scoping Requirements. Please link to the Jacumba ALUCP - <a href="http://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?Command=Core_Download&amp;EntryId=2943&amp;language=en-US&amp;PortalId=0&amp;TabId=225">http://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?Command=Core_Download&amp;EntryId=2943&amp;language=en-US&amp;PortalId=0&amp;TabId=225</a>		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR

Project Number(s): PDS2017-MPA-17-016

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
33- 1	Memorandum of Understanding	Please submit Memorandums of Understanding for <ul style="list-style-type: none"><li>• Agricultural Resources</li><li>• Air Quality</li><li>• Archaeological Resources</li><li>• Biological Resources</li><li>• Groundwater</li><li>• EIR Preparer</li><li>• Fire Protection Planning</li><li>• Historic Resources</li><li>• Land Use Planning</li><li>• Mineral Resources</li><li>• Noise</li><li>• Photometric Studies</li><li>• Revegetation Planning</li><li>• Transportation &amp; Traffic</li><li>• Visual Analysis</li><li>• Airport Hazards (Coordinate with Staff)</li></ul>		1/29/18	

Land Development Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
35- 1	General	Comments have been provided to the extent possible with the information provided . A thorough review will commence with a formal project submittal. Additional issues may arise upon formal project review.	Comment for information only	1/29/18	
35- 2	General	Project conditions will be provided after formal project submittal.	Comment for information only	1/29/18	
36- 3	General/Access	Have your project reviewed and commented on by San Diego County Fire Authority and Caltrans. Project's conditions may be revised upon further review and input from the agencies.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016		
Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
37- 1	Jurisdictional Waters	<p>The subject property contains wetlands, a lake, a stream, and/or waters of the U.S. which may be subject to regulation by State and/or federal agencies, including, but not limited to, the Regional Water Quality Control Board, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and the California Department of Fish and Wildlife. It is the applicant's responsibility to consult with each agency to determine if a permit, agreement or other approval is required and to obtain all necessary permits, agreements or approvals before commencing any activity which could impact the wetlands, lake, stream, and/or waters of the U.S. on the subject property. The agency contact information is provided below.</p> <p>U.S. Army Corps of Engineers: 5900 La Place Court, Suite 100, Carlsbad, CA 92008; (760) 602-4850; <a href="http://www.usace.army.mil/">http://www.usace.army.mil/</a></p> <p>Regional Water Quality Control Board: 73-720 Fred Waring Drive, Suite 100, Palm Desert, CA 92260; (760) 346-7491; <a href="https://www.waterboards.ca.gov/coloradoniver/">https://www.waterboards.ca.gov/coloradoniver/</a></p> <p>United States Fish and Wildlife Service: 2177 Salk Avenue, Suite 250, Carlsbad, CA 92008; (760) 431-9440; <a href="https://www.fws.gov/">https://www.fws.gov/</a></p> <p>California Department of Fish and Wildlife: 3883 Ruffin Rd., San Diego, CA 92123; (858) 467-4207; <a href="https://www.wildlife.ca.gov/">https://www.wildlife.ca.gov/</a></p>		1/29/18	
38- 1	Project Description	<p>Clarify whether SDG&amp;E will require access to the proposed storage facility. If so, the SDG&amp;E easement will have to include the location of the storage facility and any necessary access. The limits of the required easement will be determined once detailed information about the ultimate ownership of the proposed facilities are provided.</p>		1/29/18	
38- 2	Project Description	<p>Include detailed information about the required grading for this project. Additionally please clarify if the proposed grading will be performed in phases and if so, show the limits of grading associated with each phase on the plans.</p>		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
38- 3		Project Description	Provide information about the typical schedule of construction and the type of equipment used for both construction and maintenance purposes. Clarify if any construction activity is expected to occur during weekends or outside typical work hours. This will helps us identify any additional impacts such as noise levels or specific impacts to the existing road systems based on the type of equipment required for construction and maintenance that need to be analyzed during discretionary review.		1/29/18	
38- 4		Project Description/Traffic Analysis	The project description will need to be expanded to include the Operation and Maintenance component for this project with the number of Average Daily Trips (ADT), in order to document if there are any direct impacts to the roadway network generated from the implementation of this project. Cumulative impacts will be mitigated by payment of the Transportation Impact Fee (TIF).		1/29/18	
39- 1		Traffic Analysis	In order to determine if a Traffic Analysis is required, please review the Transportation and Traffic Guidelines for Determining Significance and Report Format and Content Requirements. Additional information can be obtained in the following link: <a href="http://www.sdcounty.ca.gov/dplu/docs/Traffic_Guidelines.pdf">http://www.sdcounty.ca.gov/dplu/docs/Traffic_Guidelines.pdf</a>		1/29/18	
40- 1		Plot Plan	<b>Old Highway 80 and Carrizo Gorge Road</b> * Call out the centerline * Show dimensions from the centerline to the existing edge of pavement and existing right-of-way line.		1/29/18	
40- 2		Plot Plan	Please clarify if there will be any direct access to the O&M/Storage facility from <b>Carrizo Gorge Road</b> . It appears access will be through the interior access road.		1/29/18	
40- 3		Plot Plan	Site Entry #2 appears to cross over the unnamed road. Please revise to show the driveway access from the unnamed road or		1/29/18	
40- 4		Plot Plan	Proposed gated driveway entrances must follow San Diego County Department of Public Works Design Standards DS-17, DS-18, or DS-19, to the satisfaction of the Director of PDS and San Diego County Fire Authority.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
40- 5		Plot Plan	Private Roads shall be constructed to Private Road Standards with a minimum twenty-eight foot (28') graded width with twenty-four foot (24') improved width, to the satisfaction of the Director of PDS and San Diego County Fire Authority.		1/29/18	
41- 1		Preliminary Grading Plan (PGP)	Submit a Preliminary Grading Plan. Additional information can be obtained in the following link: Preliminary Grading Guidelines <a href="http://www.sandiegocounty.gov/content/dam/sdc/pds/LandDevelopment/preliminarygradingplanguidelines.pdf">http://www.sandiegocounty.gov/content/dam/sdc/pds/LandDevelopment/preliminarygradingplanguidelines.pdf</a> Grading Ordinance <a href="http://www.sdcounty.ca.gov/dpw/land/landpdf/gradingordinance.pdf">http://www.sdcounty.ca.gov/dpw/land/landpdf/gradingordinance.pdf</a> In addition to the Preliminary Grading guidelines, the Plan shall include, but not limited to the following:		1/29/18	
41- 2		PGP	Show Assessors Parcel Numbers (APNs) for all immediately adjacent parcels adjoining the subject property of this project.		1/29/18	
41- 3		PGP	Show any buildings or structures on the site where the work is to be performed, and any structures on adjacent land within fifteen feet (15') of the project.		1/29/18	
41- 4		PGP	Show any known easements of greater than 20' width, i.e. SDG&E Transmission Line easement, Railway easement, private road easement, public road easement, etc.		1/29/18	
41- 5		PGP	Show estimates of the amount of excavation, fill, import, and export.		1/29/18	
41- 6		PGP	Show typical cross sections (existing and proposed condition) for all the public roads that are adjacent to the project and proposed on-site driveways: <i>Old Highway 80</i> and <i>Carrizo Gorge Road</i> .		1/29/18	
41- 7		PGP	Private Roads shall be constructed to Private Road Standards with a minimum twenty eight foot (28') graded width with twenty four foot (24') improved width, to the satisfaction of the Director of PDS and the San Diego County Fire Authority.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
41- 8	PGP	Project driveways shall be designed and constructed per San Diego Area Regional Standard Drawing G-14A or County of San Diego Standard Drawing DS-7 and shall provide asphalt concrete (AC) taper transition from driveways to the existing edge of pavement, to the satisfaction of the Director of PDS and San Diego County Fire Authority.		1/29/18	
41- 9	PGP	Show lines of inundation to the limits of the 100-year flood along watercourses which flow through the property, labeled "Subject To Inundation By The 100-Year Flood" on the Plan for the drainage basins greater than 100 acres.		1/29/18	
41- 10	PGP	Show all proposed on-site structures located within the inundation area raised one-foot above the 100-year base flood elevation.		1/29/18	
41- 11	PGP	Show location of any proposed LID features, post-construction BMPs, drainage devices, stormwater protection facilities, walls, cribbing, dams, or other protective devices to be constructed in connection with the proposed work.		1/29/18	
41- 12	PGP	Show adequate contours to show the topography of the existing ground; and show the proposed grading tied back to natural ground, all at the same scale as the tentative map or site plan whenever possible.		1/29/18	
42- 13	PGP	Major grading shall also show adequate cross-sections to illustrate the proposed change in landform.		1/29/18	
43- 1	Stormwater Quality Management Plan (SWQMP)	This project is east of the Pacific/Salton Sea Divide, within the California Region 7 Water Quality Control Board. Submit a Storm Water Intake Form and a Standard SWQMP to be in conformance with California State Water Resources Control Board and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance No. 10410. The BMP Design Manual and SWQMP forms are available at: <a href="http://www.sandiegocounty.gov/content/sdc/dpw/watersheds/DevelopmentandConstruction.html">http://www.sandiegocounty.gov/content/sdc/dpw/watersheds/DevelopmentandConstruction.html</a> The SWQMP is a living document to be updated to reflect any changes during the project's final plan review and construction throughout the life of the project in perpetuity.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016		
Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
43- 1	CEQA Drainage Study	Based on the amount of impervious surfaces that are being created, the project is required to prepare and submit a CEQA Drainage Study in compliance with the documents shown below.  San Diego County Hydrology Manual: <a href="http://www.sandiegocounty.gov/content/sdc/dpw/flood/hydrologymanual.html">http://www.sandiegocounty.gov/content/sdc/dpw/flood/hydrologymanual.html</a>  San Diego County Hydraulic Design Manual: <a href="http://www.sandiegocounty.gov/content/dam/sdc/dpw/FLOOD_CONTROL/floodcontrolpdfs/hydraulic_design_manual_2014.pdf">http://www.sandiegocounty.gov/content/dam/sdc/dpw/FLOOD_CONTROL/floodcontrolpdfs/hydraulic_design_manual_2014.pdf</a>		1/29/18	
43- 2	CEQA Drainage Study	For CEQA Drainage study format, please visit a San Diego County Hydrology Manual, Section 1.6, page 1-21 and Figure 1-8 <a href="http://www.sandiegocounty.gov/content/dam/sdc/dpw/FLOOD_CONTROL/floodcontroldocuments/hydro-hydrologymanual.pdf">http://www.sandiegocounty.gov/content/dam/sdc/dpw/FLOOD_CONTROL/floodcontroldocuments/hydro-hydrologymanual.pdf</a> In addition to the guideline, the study shall include, but not limited to the following:		1/29/18	
43- 3	CEQA Drainage Study	Provide DECLARATION OF RESPONSIBLE CHARGE – See San Diego County Hydrology Manual, Figure 1-9.		1/29/18	
43- 4	CEQA Drainage Study	The final CEQA Drainage report shall be signed, stamped and dated by the responsible California Registered Civil Engineer.		1/29/18	
43- 5	CEQA Drainage Study	The report should have numbered pages and a corresponding Table of Contents.		1/29/18	
43- 6	CEQA Drainage Study	In the narrative of the report please provide a summary table of <b>pre- and post-</b> development C, Tc, I, A, V <sub>100</sub> , Q <sub>100</sub> without mitigation and Q <sub>100</sub> with mitigation for each area (or point) where drainage discharges from the project. Peak runoff rates (cfs), velocities (fps) and identification of all erosive velocities (at all points of discharge) calculations for pre-development and post-development. The comparisons should be made about the same discharge points for each drainage basin affecting the site and adjacent properties.		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
43- 7	CEQA Drainage Study	Summary/Conclusion: Please discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? Provide reasons and mitigations proposed.		1/29/18	
43- 8	CEQA Drainage Study	Discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? Provide reasons and mitigations proposed.		1/29/18	
43- 9	CEQA Drainage Study	Discuss whether or not the proposed project would create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems? Provide reasons and mitigations proposed.		1/29/18	
43- 10	CEQA Drainage Study	Discuss whether or not the proposed project would place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? Provide reasons and mitigations proposed.		1/29/18	
43- 11	CEQA Drainage Study	Discuss whether or not the proposed project would place structures within a 100-year flood hazard area which would impede or redirect flood flows?		1/29/18	
43- 12	CEQA Drainage Study	Discuss whether or not the proposed project would expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?		1/29/18	
43- 13	CEQA Drainage Study	Provide Hydrologic Soil Group Map with project footprint.		1/29/18	
43- 14	CEQA Drainage Study	Provide Rainfall Isopluvials for 100 Year Rainfall Event - 6 Hours and 24 Hours Maps. Show project location.		1/29/18	
43- 15	CEQA Drainage Study	Provide Intensity-Duration Design Chart-Figure 3-2.		1/29/18	
43- 16	CEQA Drainage Study	Provide runoff coefficients for urban areas-Table 3-1.		1/29/18	
43- 17	CEQA Drainage Study	Provide Maximum overland flow length (LM) & initial time of concentration (Ti)-Table 3-2.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
44- 18		CEQA Drainage Study	Provide Existing and Proposed Conditions Hydrology Maps: * Show project footprint and drainage area boundary. * Show arrows for drainage flow path direction for each sub basin and basin. * Show node for each sub basin. * Show discharge point with A & Q information for each basin. * Show entire project boundary and offsite watershed. Include topo for upstream basin. * Show any existing FEMA floodplains/floodways which flow through the property. * Show lines of inundation to the limits of the 100-year flood along watercourses which flow through the property, labeled "Subject To Inundation By The 100-Year Flood" for drainage basins greater than 100 acres.		1/29/18	
45- 19		CEQA Drainage Study	All maps shall: * Be at a legible scale (11"x17" is a minimum map size).		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: JVR SOLAR			Project Number(s): PDS2017-MPA-17-016			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
44- 1		R/W dedication	* <i>Carrizo Gorge Road</i> is a planned Light Collector Road with Improvement Options (2.2D). This will require a total right-of-way width of eighty-eight feet (88') per County Public Road Standards. In some locations, the total right-of-way width for <i>Carrizo Gorge Road</i> does not meet the standard. The project will be required to dedicate right-of-way to meet the required width of eighty-eight feet (88'), or forty-four feet (44') from the centerline in areas		1/29/18	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
46- 1	Improvements	<i>Carrizo Gorge Road</i> and <i>Old Highway 80</i> are both Light Collector Roads with Improvement Options. This requires forty feet (40') to fifty-four feet (54') of pavement width per County of San Diego Public Roads Standards. The extent of required improvements will be determined upon formal project submittal.		1/29/18	
47- 1	Sight Distance	The project access points from public roads must demonstrate conformance with the intersectional sight distance requirements per Section 6.1.(E) of the County Public Road Standards prior to recommendation for approval. Additional information can be obtained in the following link: <a href="http://www.sdcountry.ca.gov/dpw/docs/PublicRoadStandards.pdf">http://www.sdcountry.ca.gov/dpw/docs/PublicRoadStandards.pdf</a> A sight distance study's requirement will be determined after a site visit from County staff.		1/29/18	
48- 1	Relinquish Access	The project will be required to relinquish access rights along the Mobility Element Roads, Old Highway 80 and Carrizo Gorge Road except for approved site access/driveways serving the project.		1/29/18	
49- 1	Franchise Agreement/ Encroachment Permit	Please note the project will be conditioned to obtain a franchise agreement or encroachment permit for the portion of utility		1/29/18	
50- 1	Traffic Control Plan	The project may be required to prepare a Traffic Control Plan prior to issuance of Grading, Construction, or Excavation Permits.		1/29/18	
1	Haul Route Plan	Dependent on the amount of grading required, a Haul Route Plan may be required prior to the issuance of Grading, Construction, or Excavation Permits.		1/29/18	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: JVR SOLAR**

**Project Number(s): PDS2017-MPA-17-016**

**Planning & Development Services Planning and CEQA Comments**

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
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**DEH (Department of Environmental Health) Comments**

51-1	Septic	The applicant must show any wells located on the properties as part of the project submittal. Existing wells must have their proposed use designated on the plan submittal.		1/29/18	
51-2	Septic	Any reportable quantities of hazardous materials to be stored on-site must be detailed on the project submittal.		1/29/18	
51-3	Septic	Any existing onsite wastewater treatment systems that are to be retained must be accurately plotted on the plot plan. Onsite wastewater treatment systems proposed to be abandoned, must be pumped, collapsed, and backfilled, prior to grading permit/building permit issuance.		1/29/18	
51-4	Septic	The property has several monitoring well permits associated with it on APN's: 660-150-04 and 660-020-05. Jon Senaha, EHS II, has been tasked with investigating these permits. He can be reached at 858-505-6798 or by email at <a href="mailto:jon.senaha@sdcounty.ca.gov">jon.senaha@sdcounty.ca.gov</a>		1/29/18	
51-5	Septic	The applicant should provide details on potable water and wastewater facilities for the proposed O&M building.		1/29/18	

If you have any questions regarding these comments, please contact Scott Rosecrans at (619) 208-0337

**ATTACHMENT B**  
**ESTIMATE OF DISCRETIONARY PROCESSING TIME AND COSTS**

The attached estimate of discretionary processing time and costs is an estimate of the deposits required to process the application through hearing/decision. Several assumptions were required to supply the cost estimate and schedule at this time in the process. If the assumptions listed on the bottom of the attached estimate prove to be incorrect, your cost estimate will be adjusted. Deposits will be requested in installments as funds are needed to continue processing. Be aware that Section 362 of Article XX of the San Diego County Administrative Code, Schedule B, 5 states that:

*The Director of Planning & Development Services may discontinue permit processing and/or recommend denial of the said project based on non-payment of the estimated deposit.*

The initial review of your project indicates that there will be an effect on native biological resources. Therefore, State law requires the payment of a fee to the California Department of Fish and Wildlife for their review of the project environmental document (Fish and Wildlife Code §711.4). If this fee is needed, it will be requested and collected at a later time during the process. Payment of the fee is required regardless of whether or not we consider the effect on native biological resources to be significant or clearly mitigated. The Project Manager will remind you to pay this fee immediately prior to public review of the project environmental document.

Should your application be approved, there will be additional processing costs in the future (e.g., Final Map processing costs, park fees, drainage fees, building permit fees). The above estimate includes only the costs to get your present application(s) to hearing/decision and does not include these additional processing costs.

Compliance Agreement

You are advised to carefully review the Estimate of Discretionary Processing Time and Costs and the attached Compliance Agreement. Should you choose to proceed with the application for a discretionary permit, you must submit the application and pay the required fees by the due date in this letter. Failure to meet the deadlines shown in the Estimate of Discretionary Processing Time and Costs and/or a failure to obtain an extension of time for good cause, will result in enforcement action including but not limited to issuance of administrative citations and higher levels of enforcement.

**ATTACHMENT C**



**MEMORANDUMS OF UNDERSTANDING****CONSULTANT LIST & MEMORANDUM OF UNDERSTANDING (MOU)**

The County of San Diego's CEQA guidelines require that environmental technical studies be prepared by a consultant from the County's CEQA Consultant List, which can be found on the County of San Diego's website at: <http://www.co.san-diego.ca.us/PDS/procguid.html> (item number 4 under "General Guidance"). No list is maintained for hydrology and stormwater management planning. With the exception of minor stormwater management plans, only registered engineers registered in the State of California shall be permitted to submit hydrology/drainage studies and only registered engineers or Certified Professionals in Storm Water Quality certified by CPESC, Inc., or an equivalent entity approved by the Director of Public Works, shall be permitted to submit stormwater management plans.

Applicants are responsible for selecting and direct contracting with specific consultants from the County's list to prepare CEQA documents for private projects. Prior to the first submittal of a CEQA document prepared by a listed consultant for a private project, the applicant, consultant, consultant's firm (if applicable) and County shall execute the attached Memorandum(s) of Understanding (MOU). The responsibilities of all parties involved in the preparation of environmental documents for the County (i.e. applicant, individual CEQA consultants/sub-consultants, consulting/sub-consultant firms, and County) are clearly established in the MOU for each requested applicable study. The clear identification of roles and responsibilities for all parties is intended to contribute to improved environmental document quality. The MOU can be found at: <http://www.sdcountry.ca.gov/luegdocs/Templates/Boilerplate%20Templates/MOU.doc>.

Copies must be made and signed by the applicant, consultant and firm (if applicable) for each of the following requested subject area technical studies:

- Agricultural Resources
- Air Quality
- Archaeological Resources
- Biological Resources
- Groundwater
- EIR Preparer
- Fire Protection Planning
- Historic Resources
- Land Use Planning
- Mineral Resources
- Noise
- Photometric Studies
- Revegetation Planning
- Transportation & Traffic
- Visual Analysis
- Airport Hazards (Coordinate with Staff)

**ATTACHMENT D**  
**SCOPE FOR VISUAL RESOURCES & AESTHETICS**



Planning & Development Services has completed review of your project application and has determined that the project may adversely affect visual resources. Visual resources can include narrow or expansive views, can be views from one site or from a series of sites (as along a scenic highway), and can be viewed from above, at eye level, or from below. A particular thing that defines a community or a region's character and identity is also a scenic resource.

The aesthetic value of visual resources is not limited to open space and rural lands, but can also be held in historic structures and districts, architectural design, streetscapes and manufactured landscapes. These valuable aesthetic elements of the human-made environment can be found throughout the unincorporated County, even though it is mostly undeveloped.

The proposed project has the potential to adversely affect visual resources. A Visual Resources Report shall be prepared to assess the impacts that will result from the construction and operation of this project.

Planning & Development Services has completed review of the project design and has determined that the project may impact dark skies or may cause significant glare. A Photometric Study shall therefore be prepared for the project. The study shall follow the County's Report Format and Content Requirements for Dark Skies and Glare (Photometric Study) (available at [http://www.sdcounty.ca.gov/PDS/docs/Dark\\_Skies\\_Photometric\\_Study.pdf](http://www.sdcounty.ca.gov/PDS/docs/Dark_Skies_Photometric_Study.pdf)) and shall analyze impacts according to the County's Guidelines for Determining Significance (available at [http://www.sdcounty.ca.gov/PDS/docs/Dark\\_Skies\\_Guidelines.pdf](http://www.sdcounty.ca.gov/PDS/docs/Dark_Skies_Guidelines.pdf)).

The report must be prepared by:

- A National Council on Qualifications for the Lighting Professions, Lighting Certified (NCQLP LC) Designer;
- State of California licensed electrical engineer;
- State of California licensed architect; or
- State of California licensed contractor.

The report must follow the format given in the County's Report Format and Content Requirements for Visual Resources, which can be found at: [http://www.sdcounty.ca.gov/PDS/docs/Visual\\_Report\\_Formats.pdf](http://www.sdcounty.ca.gov/PDS/docs/Visual_Report_Formats.pdf).

The report must evaluate potentially adverse impacts to the environment according to the County's Guidelines for Determining Significance for Visual Resources, which can be found at: [http://www.sdcounty.ca.gov/PDS/docs/Visual\\_Guidelines.pdf](http://www.sdcounty.ca.gov/PDS/docs/Visual_Guidelines.pdf). The report must be prepared by a visual resources analyst who is on the County's approved consultant list for completing Visual Resource Reports.

**ATTACHMENT E**  
**SCOPE FOR AGRICULTURAL RESOURCES**

The project site is primarily undeveloped. The site has been used for agricultural purposes in the past; however such lands now lie fallow. Land designated as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, as defined by California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) are present on the property. Based on the potential impacts the project may have on agricultural resources, an agricultural resources technical report is required to evaluate the significance of potential impacts. The agricultural analysis must be completed using the County's approved Guidelines for Determining Significance and Report Format and Content Requirements which can be found on the World Wide Web at:

<http://www.sdcountry.ca.gov/PDS/docs/AG-Guidelines.pdf> (Guidelines) and  
<http://www.sdcountry.ca.gov/PDS/docs/AG-Report-Format.pdf> (Report Formats).

**The attached Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review.**



## ATTACHMENT F SCOPE FOR AIR QUALITY

### Project Specific Information:

The proposed project has the potential to significantly contribute to the violation of an air quality standard or significantly contribute to an existing or projected air quality violation, related to grading and construction activities and operational activities. Therefore, the proposed project is required to discuss the project's potential impacts to air quality by preparing an Air Quality Analysis Report.

### General Information:

Based on the potential impacts the proposed project may have on air quality, an Air Quality Analysis Report is required. The County has approved *Guidelines for Determining Significance and Report Format and Content Requirements* dated March 19, 2007 which can be found here: <http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf> and here: <http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Report-Format.pdf>. The Report should be prepared pursuant to these guidance documents.

The construction emissions inventory must account for all onsite and offsite construction activities associated with the project, including but not limited to, grading activities, drilling, trenching, helicopters, wire stringing, tracker installation, inverter station installation, gen-tie line construction, substation construction, building construction, paving, landscaping, architectural coatings, and worker, haul truck, and vendor trips, including heavy-duty trucks. Additionally, emissions associated with transport of construction materials, concrete delivery truck trips, water truck trips, including soil import/export, waste export, water import, or any other traffic associated with construction activities, must be included in the analysis. There are existing rural sensitive receptors located in close proximity to the project site. The impact of construction emissions on these receptors from fugitive dust emissions, criteria pollutants, and toxic air contaminants must be addressed in the Report.

Emissions of pollutants of concern from the proposed project may occur from construction/grading activities. In general, emissions from construction activities include:

- Particulate matter less than 10 microns and 2.5 microns (PM<sub>10</sub> and PM<sub>2.5</sub>) from grading and soil disturbance, road improvements, operation of construction equipment, haul trucks, vendor vehicles, and worker commute vehicles;
- PM<sub>10</sub> and PM<sub>2.5</sub> from rock processing equipment including rock breaking activities, operation of feed hoppers, primary and secondary crushers, screens, conveyors, and stockpiles, if applicable;
- PM<sub>10</sub> and PM<sub>2.5</sub> from rock drilling operations for blasting preparation, if applicable;
- Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub> from explosives detonation for blasting, if applicable;
- Products of combustion, including toxic air contaminants, from operation of construction equipment, wire stringing equipment, helicopters, drilling equipment, haul trucks (e.g., soil and excavated rock import/export), vendor vehicles (e.g., building material delivery,



concrete delivery, water truck trips, blasting material delivery), worker commute vehicles, and stationary sources (such as generators, if any); and

- Products of combustion, including toxic air contaminants, from mobile sources resulting from traffic during construction.

The operational emissions analysis must quantify emissions from mobile sources, area sources, battery components such as onsite coating operations or others, and onsite energy use. The Report must assess emissions from project components that may contribute to operational emissions.

Emissions of pollutants of concern from the proposed project may occur from project operation. In general, emissions from operational activities include:

- Products of combustion, including toxic air contaminants, from helicopters, stationary sources (such as generators, if any), and traffic throughout the project site and beyond;
- Area sources such as landscaping equipment, consumer products, and architectural coatings;
- Onsite energy consumption using natural gas or other fuels; and
- Queuing of vehicles at traffic lights can result in concentration of emissions, known as "hot spots". Given the status of the San Diego Air Basin, principal emissions of concern are CO, VOC, and NO<sub>x</sub>. In order to adequately assess emissions during build-out of the area, the analysis should assess level of service impacts along major roadways.

Emissions of pollutants of concern from the proposed project may occur from decommissioning activities. Decommissioning impacts from the solar panels include fugitive dust and exhaust emissions, which would be anticipated to be similar to those generated by construction activities. Emissions from decommissioning activities include respirable particulate matter and combustion emissions from disassembly of the solar panels, removal of the detachable aboveground elements, removal of tracker masts, demolition of on-site buildings, removal or perimeter fencing, and restoration of the site. Respirable particulate matter from construction equipment, haul truck, and worker commute vehicles; products of combustion, including hazardous air pollutants, from construction equipment, haul trucks, worker commute vehicles, and stationary equipment (such as generators, if any).

Additionally, the following issues should be addressed as a part of the air quality analysis:

1. Would the proposed project conflict or obstruct the implementation of the San Diego Regional Air Quality Strategy (RAQs) or applicable portions of the State Implementation Plan (SIP)?
2. Would the proposed project result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?
3. Since San Diego County is presently in non-attainment for the federal and/or State ambient air quality standards for ozone (O<sub>3</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>, would the proposed project result in a cumulatively considerable net increase of PM<sub>10</sub>, PM<sub>2.5</sub>, or exceed quantitative thresholds for O<sub>3</sub> precursors, NO<sub>x</sub>, and VOCs? The analysis should also provide a detailed discussion on cumulative impacts, framed in light of past, present, and

reasonable anticipated future projects in the project area. This should include a discussion on other projects contribution of PM<sub>10</sub>, PM<sub>2.5</sub>, and O<sub>3</sub> precursors.

4. Would the proposed project operational and construction activities expose sensitive receptors (residences, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations? This analysis should discuss the proximity of any surrounding or proposed sensitive receptors to any known point source pollutant emissions and if applicable, a screening-level health risk assessment for diesel-fired PM<sub>10</sub>.
5. Would the proposed project have the potential to generate offensive odors? The analysis should discuss the potential sources of odorous emissions from the proposed project and if the project operations will cause an odor nuisance to the nearby public.

Any proposed dust control measures or project design features that may be incorporated to minimize criteria pollutant emissions should be described in the project description.

**The attached Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review.**



**ATTACHMENT G**  
***SCOPE FOR BIOLOGICAL RESOURCES REPORT/LETTER REPORT***

**PROJECT SPECIFIC INFORMATION:** The Jacumba Valley Ranch (JVR) Solar project proposes to construct an approximately 100-MW photovoltaic solar electrical generation facility on an approximately 1,289-acre project site in Jacumba. The site is located in the East County Multiple Species Conservation Program (MSCP) area. The project site is predominantly outside of the designated Focused Conservation Area.

The applicant provided a Biological Analysis Memorandum dated November 10, 2017. Vegetation mapping and analysis determined that there are a number of habitat types on site, such as scrub and chaparral vegetation communities, wetland and riparian habitats, developed lands, and fields/pastures. Sensitive plant and wildlife species have been identified on and near the project site. Biological habitat assessments and/or focused surveys will be required to identify and assess potential impacts to sensitive species. Project impacts to sensitive habitats and species will require mitigation. As discussed in the Biological Analysis Memorandum, the project site contains wetlands and jurisdictional waters, which are subject to the Resource Protection Ordinance and permitting requirements of federal and state authorizing agencies as outlined below.

Staff requests that the applicant provide evidence of permits for existing graded, brushed, and/or cleared land. The applicant may demonstrate this by providing evidence of permits for previous grading or clearing activity and/or a written letter from a fire marshal. If evidence of legal clearing/grading is not provided, please include in the report a forensic analysis of habitats that would be expected to predate the existing disturbance/ development.

Please provide a full Biological Resources Report that includes biological surveys and assessment, groundwater-dependent vegetation impacts assessment, and specific information pertaining to proposed on and/or off-site mitigation. All on-site and off-site impacts as well as permanent and temporary impacts, including any fuel modification zones, need be shown/reported.

**GENERAL INFORMATION:** A full Biological Resource Report must be prepared in accordance with the County's Report Format and Content Requirements Biological Resources, which can be found at [https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Biological\\_Report\\_Format.pdf](https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Biological_Report_Format.pdf). The report will provide a qualitative and quantitative analysis of all on and off-site biological impacts (both direct and indirect) related to all phases of the project and include resource mapping with the most current project plan and any proposed open space and limited building zone easements. The County staff biologist reviewing the Biological Resource Report will hold an onsite meeting with the biology consultant for field verification after the first iteration report is submitted. At the discretion of the County staff biologist, the field meeting may be waived with a written explanation.



Staff has prepared and attached a list of sensitive species that may exist on the project site. Directed and/or protocol surveys are required for species shown in **boldface** type in the list. The biology report shall address the potential for each sensitive species to occur on the project site (table format). For further guidance please see the Report Format and Content Guidelines.

PDS has also determined that the report shall include **habitat site assessment** and **focused survey(s)** for the following rare and endangered species: **rare plants, burrowing owl, tri-colored blackbird, Quino checkerspot butterfly, herpetological species, unarmored three-spine stickleback, peninsular bighorn sheep, and golden eagle**. Focused survey(s) may be waived if it can be demonstrated that the site does not contain suitable habitat, subject to County staff review. The focused survey(s) must be done by biologist(s) with demonstrable knowledge in field detection of the subject species (focused surveys for Federally listed species shall be in compliance with USFWS protocol, when such protocol exists, and must be done by a USFWS permitted biologist -- contact the USFWS at (760) 431-9440). If no protocol has been established, the methods of the directed search shall be described in the report. At a minimum, focused surveys must consist of walking transects across all areas with potential habitat for the species. The point locations and inferred territories of these species shall be included on the biological resources map. Focused surveys reports may be attached to the biological survey report in appendix form, but survey results must be evaluated in the biological survey report.

The report must also propose applicable and feasible mitigation measures. Examples are listed in Appendix A of the Report Format and Content Guidelines.

**Proposed Off-site Mitigation** – If off-site mitigation is proposed to mitigate for significant biological impacts, please provide a statement indicating where the off-site mitigation will be located. If the off-site mitigation will be obtained in a mitigation bank, please provide the name of the bank along with evidence that such credits can be allocated for this project. If the off-site mitigation will be through the purchase and preservation of other off-site land, please provide sufficient information for staff to evaluate the off-site resources and the means to preserve the resources in perpetuity.

**Open Space Easements** – If biological open space is proposed, please submit a project-scale Open Space Map. The Open Space Map must show what biological resources are being protected and include a table showing the area (in acres) of land preserved according to vegetation type. All Biological Open Space Easements shall be protected from future fire-clearing through the dedication of a Limited Building Zone Easement. This easement is 100 feet wide and extends outward from the Biological Open Space Easement boundary. The Limited Building Zone Easement prohibits the construction of houses, barns, or other habitable structures that would require fire clearing into the Biological Open Space.

All existing and proposed open space easements (biological resource & limited building zones) must be clearly shown on the plans/map and on the preliminary grading plan.

In association with any proposed open space easements, temporary and/or permanent fencing and permanent signs may be required to protect the easements. These conditions are meant to protect from inadvertent disturbance of all open space easement(s) that do not allow grading,



brushing or clearing. The open space fencing/signage plan for the proposed biological open space easement must be clearly shown on the preliminary grading plan and on the Open Space Map.

**Interim Review** – The project may disturb sensitive habitat communities, sensitive plant and animal species and/or jurisdictional waters. County staff will consult with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (the "Wildlife Agencies") to identify and address any additional biological resource issues. The biological consultant and/or applicant may be asked to participate in these meetings and/or provide materials.

**RPO** – The project site contains one or more natural drainages that may qualify as a wetland under the San Diego County Resource Protection Ordinance (RPO). The Resource Protection Ordinance prohibits impacts to wetlands and wetland buffers. The project site may also contain RPO Sensitive Habitat Lands that contain unique biological resources. The RPO requires avoidance of these resources. These natural features are a significant constraint for land uses on the project site and may affect project design. The biological information requested below is required for staff to determine project compliance with the RPO.

**Wetlands Survey** – A wetlands survey must be completed using the wetlands definition in the County's Resource Protection Ordinance (RPO). The County's definition of wetlands varies from the federal U.S. Army Corps of Engineers' definition. All RPO wetlands shall be mapped on the Biological Resources Map using aerial photographs and a field site visit. Should there be a disagreement over the extent of wetlands, staff may require further surveys using the U.S. Army Corps of Engineers standards and guidance for conducting wetland delineations.

The RPO requires buffers on all RPO wetlands. The biological resources map shall designate an appropriate wetland buffer width of 50-200 feet, depending on the biological resources present. The RPO prohibits impacts to wetlands and wetland buffers. Any part of the site that is a wetland and/or a wetland buffer must be placed into a dedicated Biological Open Space Easement. All Biological Open Space Easements shall be protected from future fire-clearing through the dedication of a Limited Building Zone Easement. This easement is 100 feet wide and extends outward from the Biological Open Space Easement boundary. The Limited Building Zone Easement prohibits the construction of houses, barns, or other habitable structures that would require fire clearing into the Biological Open Space. Once the wetland(s), wetland buffer(s) and limited building zone easement(s) are mapped, redesign of the proposed project may be required.

**Jurisdictional Resources** – PDS staff has determined that the project may disturb wetlands, lakes, streams, and/or waters of the U. S. that may require notification to the Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), and/or the Army Corps of Engineers (ACOE). PDS recommends that you contact the above agencies about the permitting requirements for potential disturbances to wetlands, lakes, streams, and/or waters of the U. S. If such permitting requirements are incorporated into the project at this time, it may prevent future delays or changes in the project design. RWQCB general information and submittal information can be obtained through the RWQCB website [https://www.waterboards.ca.gov/rwqcb9/water\\_issues/programs/401\\_certification/index.html](https://www.waterboards.ca.gov/rwqcb9/water_issues/programs/401_certification/index.html) or



by contacting the general information number @ (619) 521-1990. CDFW general information and submittal information can be obtained through the CDFW website <https://www.wildlife.ca.gov/Conservation/LSA> or by contacting the CDFW South Coast Regional Office @ (858) 636-3160. Information for consultation and formal submittal of the 404 Permit application required by the ACOE can be obtained through their website at: <http://www.spl.usace.army.mil/regulatory/> or through the general information number at (858) 674-5387. When a formal wetland delineation is requested, the ACOE 1987 Wetland Delineation Manual and supplement "Guidelines for Jurisdictional Determinations for Waters of the United States in the Arid Southwest" should be used.

**Please be aware that the County will not issue any permit authorizing land disturbance (e.g., grading permits) which may disturb wetlands, lakes, streams, and/or waters of the U.S. until all required permits/agreements from these agencies have been obtained or are determined to be not required.**

**Indirect Impacts** – Indirect impacts may be the result of secondary effects from direct impacts or those impacts that over time cause the degradation of a resource by changing its function, health or quality. Unlike direct impacts that are typically one-time effects, indirect impacts often continue in the long term and may actually increase.

Indirect impacts commonly result from a project's "edge effects." Edge effects from development may extend several hundred feet into adjacent open space areas, causing significant changes in species composition, diversity and abundance in those nearby lands. Projects can have a wide variety of indirect impacts depending on the nature of the project, the type of resources present, and the type and degree of edge effects. Certain restrictions may be required when the project proposes significant noise within close proximity to existing or proposed open space.

**Migratory Bird Treaty Act** – The site appears to have mature native and/or ornamental trees which may be used for nesting by migratory birds. Any grading, brushing or clearing conducted during the migratory bird breeding season, February 1 – August 31, has a potential to impact nesting or breeding birds in violation of the Migratory Bird Treaty Act. The applicant may submit evidence that nesting or breeding migratory birds will not be affected by the grading, brushing or clearing to these agencies: California Department of Fish and Wildlife, 3883 Ruffin Rd., San Diego, CA 92123, (858) 467-4201, <http://www.dfg.ca.gov/>; and United States Fish and Wildlife Service, 6010 Hidden Valley Rd, Carlsbad, CA 92011-4219, (760) 431-9440, <http://www.fws.gov/>.

**The Memorandum of Understanding must be executed by the applicant and consultant, and subsequently submitted with the first iteration review.**

### Comprehensive List of Sensitive Species



Plant	Animal	Latin Name	Common Name	Directed Survey Required
X		<i>Androsace elongata acuta</i>	California rosace	
X		<b><i>Astragalus douglasii perstrictus</i></b>	<b>Jacumba Milkvetch</b>	<b>X</b>
X		<b><i>Ayenia compacta</i></b>	<b>Ayenia</b>	<b>X</b>
X		<i>Berberis fremontii</i>	Fremont barberry	
X		<b><i>Bursera microphylla</i></b>	<b>Elephant tree</b>	<b>X</b>
X		<i>Caulanthus simulans</i>	Payson's jewelflower	
X		<b><i>Chaenactis carphoclina peirsonii</i></b>	<b>Peirson's pincushion flower</b>	<b>X</b>
X		<b><i>Clarkia delicata</i></b>	<b>Campo clarkia</b>	<b>X</b>
X		<i>Cryptantha holoptera</i>	Winged cryptantha	
X		<i>Cynanchum utahense</i>	Utah vine milkweed	
X		<i>Delphinium parishii subglobosum</i>	Desert larkspur	
X		<b><i>Eucnide rupestris</i></b>	<b>Rock nettle</b>	<b>X</b>
X		<b><i>Geraea viscida</i></b>	<b>Sticky geraea</b>	<b>X</b>
X		<i>Gilia caruifolia</i>	Caraway leaved gilia	
X		<i>Harpagonella palmeri</i>	Palmer's grappling hook	
X		<b><i>Hemizonia floribunda</i></b>	<b>Tecate tarplant</b>	<b>X</b>
X		<b><i>Herissantia crispa</i></b>	<b>Curly herissantia</b>	<b>X</b>
X		<b><i>Heuchera brevistaminea</i></b>	<b>Mt. Laguna alumroot</b>	<b>X</b>
X		<b><i>Hulsea mexicana</i></b>	<b>Mexican hulsea</b>	<b>X</b>
X		<b><i>Hulsea californica</i></b>	<b>California hulsea</b>	<b>X</b>
X		<b><i>Ipomopsis tenuifolia</i></b>	<b>Slender leaved ipomopsis</b>	<b>X</b>
X		<i>Lathyrus splendens</i>	Pride of California	
X		<b><i>Lepidium flavum felipense</i></b>	<b>Borrego peppergrass</b>	<b>X</b>
X		<b><i>Linanthus bellus</i></b>	<b>Desert beauty</b>	<b>X</b>
X		<b><i>Lotus haydonii</i></b>	<b>Pygmy lotus</b>	<b>X</b>
X		<b><i>Lupinus excubitus medius</i></b>	<b>Mtn. Springs bush lupine</b>	<b>X</b>
X		<i>Lyrocarpa coulteri palmeri</i>	Palmer's lyrepod	
X		<i>Machaeranthera asteroides var. lagunensis</i>	Mount Laguna aster	
X		<b><i>Matelea parvifolia</i></b>	<b>Climbing spearleaf</b>	<b>X</b>
X		<b><i>Mentzelia hirsutissima</i></b>	<b>Hairy stickleaf</b>	<b>X</b>
X		<i>Mimulus aridus</i>	Desert monkey flower	
X		<i>Mirabilis tenuiloba</i>	Slender lobed four o'clock	
X		<i>Penstemon thurberi</i>	Thurber's beardtongue	
X		<i>Pentachaeta aurea</i>	Golden-rayed pentachaeta	
X		<i>Proboscidea althaeifolia</i>	Desert unicorn plant	
X		<i>Quercus engelmannii</i>	Engelmann oak	
X		<b><i>Ribes canthariforme</i></b>	<b>Morena currant</b>	<b>X</b>
X		<b><i>Selaginella eremophila</i></b>	<b>Desert spike moss</b>	<b>X</b>
X		<b><i>Senecio aphanactis</i></b>	<b>Rayless ragwort</b>	<b>X</b>

X	<i>Senna covesii</i>	Cove's cassia	X
X	<i>Streptanthus campestris</i>	Southern jewelflower	X
X	<i>Tetracoccus dioicus</i>	Parry's tetracoccus	
X	<i>Accipiter cooperi</i>	Cooper's hawk	X
X	<i>Accipiter striatus</i>	Sharp-shinned hawk	X
X	<i>Agelaius tricolor</i>	Tricolored blackbird	X
X	<i>Aimophila ruficeps canescens</i>	Rufous-crowned sparrow	X
X	<i>Amphispiza belli belli</i>	Bell's sage sparrow	X
X	<i>Antrozous pallidus</i>	Pallid bat	
X	<i>Aquila chrysaetos</i>	Golden eagle	X
X	<i>Ardea herodias</i>	Great blue heron	
X	<i>Athene cunicularia hypugea</i>	Burrowing owl	X
X	<i>Bassariscus astutus</i>	Ringtail	
X	<i>Buteo lineatus</i>	Red-shouldered hawk	X
X	<i>Cathartes aura</i>	Turkey vulture	X
X	<i>Chaetodipus californicus femoralis</i>	Dulzura California pocket mouse	
X	<i>Chaetodipus fallax fallax</i>	Northwestern San Diego pocket mouse	
X	<i>Chaetodipus fallax pallidus</i>	Pallid San Diego pocket mouse	
X	<i>Charina trivirgata roseofusca</i>	Coastal rosy boa	
X	<i>Cnemidophorus tigris multiscutatus</i>	Coastal western whiptail	
X	<i>Coleonyx switaki</i>	Barefoot gecko	
X	<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	
X	<i>Crotalus ruber ruber</i>	Northern red diamond rattlesnake	
X	<i>Danaus plexippus</i>	Monarch butterfly	
X	<i>Dendroica petechia brewsteri</i>	Yellow warbler	
X	<i>Diadophis punctatus similis</i>	San Diego ringneck snake	
X	<i>Euderma maculatum</i>	Spotted bat	
X	<i>Eumops perotis californicus</i>	Greater western mastiff bat	
X	<i>Euphydryas editha quino</i>	Quino checkerspot butterfly	X
X	<i>Falco mexicanus</i>	Prairie falcon	X
X	<i>Felis concolor</i>	Mountain lion	
X	<i>Gasterosteus aculeatus williamsoni</i>	Unarmored three-spine stickleback -- introduced in San Felipe C.	
X	<i>Grus canadensis</i>	Sandhill crane (Now very rare)	
X	<i>Haliaeetus leucocephalus</i>	Bald eagle (Winter)	X
X	<i>Larus californicus</i>	California gull (Non-breeding)	
X	<i>Lasiurus blossevillei</i>	Western red bat	
X	<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	
X	<i>Macrotus californicus</i>	California leaf-nosed bat	
X	<i>Melanerpes lewis</i>	Lewis' woodpecker (Winter)	X
X	<i>Myotis ciliolabrum</i>	Small-footed myotis	
X	<i>Myotis evotis</i>	Long eared myotis	
X	<i>Myotis thysanodes</i>	Fringed myotis	
X	<i>Myotis volans</i>	Long legged myotis	
X	<i>Myotis yumanensis</i>	Yuma myotis	
X	<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	
X	<i>Nyctinomops macrotis</i>	Big free-tailed bat	

X	<i>Nyctinomops femorosaccus</i>	Pocketed free-tailed bat	
X	<i>Odocoileus hemionus</i>	Southern mule deer	
X	<i>Onychomys torridus ramona</i>	Southern grasshopper mouse	
X	<i>Oreortyx pictus eremophila</i>	Mountain quail	
X	<b><i>Ovis canadensis nelsoni</i></b>	<b>Peninsular bighorn sheep</b>	<b>X</b>
X	<b><i>Pandion haliaetus</i></b>	<b>Osprey (Rarely breeds)</b>	<b>X</b>
X	<i>Perognathus longimembris internationalis</i>	Jacumba little pocket mouse	
X	<i>Phrynosoma coronatum blainvillei</i>	San Diego horned lizard	
X	<i>Piranga rubra</i>	Summer tanager	
X	<b><i>Progne subis</i></b>	<b>Purple Martin</b>	<b>X</b>
X	<b><i>Pseudocopaeodes eunus eunus</i></b>	<b>Alkali skipper</b>	<b>X</b>
X	<i>Salvadora hexalepis virgulata</i>	Coast patch-nosed snake	
X	<i>Sauromalus obesus</i>	Chuckwalla	
X	<i>Sceloporus graciosus vandenburgianus</i>	Southern sagebrush lizard	
X	<i>Sialia mexicana</i>	Western bluebird	
X	<i>Taxidea taxus</i>	American badger	
X	<b><i>Thamnophis hammondi</i></b>	<b>Two stripe garter snake</b>	<b>X</b>
X	<i>Thamnophis sirtalis novum</i>	South Coast garter snake	
X	<i>Toxostoma lecontei lecontei</i>	Leconte's thrasher	



**ATTACHMENT H**  
**SCOPE FOR CULTURAL RESOURCES**

**CULTURAL SURVEY**Project Specific Information:

A cultural resources constraints analysis was completed by Dudek for the proposed project titled "Cultural Resources Constraints Analysis for the Jacumba Valley Ranch Solar Project, San Diego County, California," (November 2017). The constraints analysis consisted of a cultural records search that identified numerous cultural resources within the proposed project area. These resources include individual archaeological sites and the Jacumba Valley Archaeological District (JVAD). The JVAD has been determined eligible for listing in the National Register of Historic Places (NRHP); therefore, it is considered a significant resource under CEQA.

**Major Project Issue:** The current design of the proposed project may result in unmitigable significant impacts to cultural resources. Re-design is recommended to avoid any significant resources that are identified in the required cultural studies. As discussed in the constraints analysis, it should be noted that if any federal permits are required for the project, then Section 106 of the National Historic Preservation Act (NHPA) and consultation with the State Historic Preservation Officer regarding project effects to the district would also apply.

Cultural Study Information:

A field survey (including off-site improvements) for the presence of archaeological or tribal cultural resources and/or an evaluation of the site as a historic resource must be conducted in accordance with the Resource Protection Ordinance (RPO), Section 21083.2 of the Public Resources Code (CEQA), and the San Diego County CEQA Guidelines. The survey must provide evidence in the form of a letter from the South Coastal Information Center (SCIC) that an institutional record searches has been conducted. In addition, a field survey and/or evaluation by a County approved archaeologist must be conducted. The report must follow the required report format as outlined in the Report Format and Content Guidelines. Please complete all appropriate DPR Series 123 forms and submit them to the South Coastal Information Center and PDS. A Kumeyaay Native American monitor is required during the survey for archaeological resources. The study must include a discussion of the absence or presence of tribal cultural resources and must include a Sacred Lands check with the Native American Heritage Commission (NAHC). The study must provide the results of outreach with listed tribes provided by the NAHC.

Guidelines for Determining Significance and Report Format and Content Guidelines can be obtained from the County website at:

<http://www.sdcounty.ca.gov/dplu/Resource/3~procguid/3~procguid.html#arch>

If no cultural resources are identified, a brief letter report will be satisfactory documentation of the survey.



If the survey is positive for resources, scientific evidence must be provided to substantiate (a) the resources' significance, and (b) the boundaries of the resource(s). If the resources extend off-site, these must be shown on the map and discussed. The report must address both CEQA and County RPO significance criteria for each resource as outlined in the Guidelines for Determining Significance. The report must address the direct construction impacts to resources (both on- and off-site) and make a determination as to impact severity. Any resource(s) that will be exposed to indirect impacts from the project should be addressed as well.

All project specific archaeological/cultural site location maps and figures must be submitted under a separate confidential appendix that clearly states that the contents are not for public review.

Native American Consultation: When the project is submitted, County staff will conduct outreach with the Native American communities for the purpose of AB-52 consultations. The intent of Native American consultation is to allow tribes an opportunity to participate in local land use decisions at an early planning stage for the purpose of protecting, or mitigating impacts to Native American cultural resources. Your presence at consultation meetings with the tribes may be requested to address their issues and concerns.

#### **ARCHAEOLOGICAL SIGNIFICANCE TESTING**

Project Specific Information: Depending on the results of the archaeological survey, significance testing may be necessary. If resources are present, avoidance must be considered as the first option. If avoidance is not feasible, then significance testing must be conducted.

General Information: If the project design will impact cultural resources, a County approved archaeologist must conduct scientific testing to determine the significance, boundaries, and area (square meters/yards) of the resource(s). A Kumeyaay Native American monitor must be present during the significance testing phase. All testing must be screened through a 1/8 inch mesh or finer screen unless the use of larger mesh has been approved by Planning & Development Services. Any faunal that is identified must be evaluated by a faunal professional. Testing shall be approved by Planning & Development Services prior to commencing fieldwork.

The project is subject to the RPO. If the cultural resources do not meet the definition of a significant prehistoric and/or historic site as defined in the RPO but do meet CEQA significance criteria, mitigation in the form of avoidance (preservation) should be considered first. However if avoidance is infeasible, then data recovery should be considered as mitigation. If the cultural resources do meet the definition of a significant prehistoric and/or historic site as defined in the RPO, avoidance is required. Dedication of open space over the resource would be required. The open space easement should be identified as an "Environmentally Sensitive Area" (ESA) open space on the plans. Depending on project characteristics, a preservation plan may be required.

**PRESERVATION PLAN***Archaeological Resources*

If significance testing produces evidence that indicates resources are to be protected pursuant to the RPO, or if preservation is the form of mitigation selected for CEQA significant sites, the project should be redesigned, if necessary, to avoid impacts and preserve the resource(s). The report should address the need to cap the resource(s) with soil, gravel, jute landscape matting, and/or leaf compost to protect the site from indirect impacts. Open space easements or other measures should also be considered to prevent future impacts to resources.

*HISTORIC RESOURCES*

If the historic resource evaluation determines that a site is significant pursuant to CEQA, RPO, or the County's Guidelines for Determining Significance, the report must include a preservation plan. Adaptive reuse, open space easements, facade easements, and other conservation easements should be considered as mitigation. Specific performance criteria and/or easements should be proposed to guide future landowners.

**Disposition of Cultural Materials**

The report shall include both the curation and repatriation of artifacts as options. Any human remains identified is subject to Public Resources Code §5097.98, CEQA §15064.5, Health & Safety Code §7050.5, and the County's RPO. Disposition of human remains and associated grave goods will be determined during consultation with the Most Likely Descendant.

**The attached Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review.**



**ATTACHMENT I**  
**PALEONTOLOGICAL RESOURCES CONDITIONS**

**GRADING PERMIT:** *(Prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits).*

**PALEO#1. PALEO GRADING MONITORING**

**INTENT:** In order to mitigate for potential impacts to paleontological resources, a monitoring program during grading, trenching or other excavation into undisturbed rock layers beneath the soil horizons and a fossil recovery program, if significant paleontological resources are encountered, shall be implemented pursuant to the [County of San Diego Guidelines for Determining Significance for Paleontological Resources](#). **DESCRIPTION OF REQUIREMENT:** A Qualified Paleontologist shall be contracted to perform paleontological resource monitoring and a fossil recovery program if significant paleontological resources are encountered during all grading, trenching, or other excavation into undisturbed rock layers beneath the soil horizons. The monitoring program shall include the following:

- a. A Qualified Paleontologist ("Project Paleontologist") shall perform the monitoring duties pursuant to the most current version of the [County of San Diego Guidelines for Determining Significance for Paleontological Resources](#), and this permit. The contract or letter of acceptance provided to the County shall include an agreement that the grading/ trenching/excavation monitoring will be completed, and a [Memorandum of Understanding \(MOU\)](#) between the Project Paleontologist and the County of San Diego shall be executed. The contract or letter of acceptance shall include a cost estimate for the monitoring work and reporting.
- b. The cost of the monitoring shall be added to the grading bonds or bonded separately.

**DOCUMENTATION:** The applicant shall provide a copy of the Grading Monitoring Contract or letter of acceptance, cost estimate, and [MOU](#) to the [PDS, PPD]. Additionally, the cost amount of the monitoring work shall be added to the grading bond cost estimate. **TIMING:** Prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits. **MONITORING:** The [PDS, PPD] shall review the contract or letter of acceptance, [MOU](#) and cost estimate or separate bonds for compliance with this condition. The cost estimate should be forwarded to [PDS, LDR], for inclusion in the grading bond cost estimate and grading bonds and the grading monitoring requirement shall be made a condition of the issuance of the grading or construction permit.

**OCCUPANCY:** *(Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).*

## **PALEO#2. PALEO RESOURCES REPORT**

**INTENT:** In order to ensure that the Grading Monitoring occurred during the grading, trenching or other excavation phase of the project, a final report shall be prepared. **DESCRIPTION OF REQUIREMENT:** A final Paleontological Resources Mitigation Report that documents the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program shall be prepared. The report shall include the following:

- a. If no paleontological resources were discovered, submit a Negative letter report, which states that the monitoring has been completed and that no paleontological resources were discovered.
- b. If resources were discovered and recovered during grading, a detailed report shall be prepared by the Project Paleontologist. The report shall comply with the [County of San Diego's Guidelines for Determining Significance for Paleontological Resources](#). The report shall identify which accredited institution has agreed to accept the curated fossils and include proof of the Transfer of Paleontological Resources, in the form of a letter, from the director of the paleontology department of the accredited institution to the Director of PDS verifying that the curated fossils from the project site have been received by the institution.

**DOCUMENTATION:** The Project Paleontologist shall prepare the final report and submit it to the [PDS, PPD] for approval. If resources were discovered then the following shall be completed:

- a. Transfer the cataloged fossil remains and copies of relevant field notes, maps, stratigraphic sections, and photographs to an accredited institution (museum or university) in California that maintains paleontological collections for archival storage and/or display; and
- b. The applicant shall submit two hard copies of the final Paleontological Resources Mitigation Report to the [PDS, PPD] for final approval of the mitigation, and submit an electronic copy of the complete report in Microsoft Word on a USB disk. In addition, submit one copy of the report to the San Diego Natural History Museum and one copy to the institution that received the fossils.

**TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be prepared. **MONITORING:** The [PDS, PPD] shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, [PDS, PPD] shall inform [PDS, LDR] and [DPW, PDCI], that the requirement is complete and the bond amount can be relinquished. If the monitoring was bonded separately, then [PDS, PPD] shall inform [PDS, FISCAL] to release the bond back to the applicant.



**GRADING/IMPROVEMENT PLAN NOTES - PALEONTOLOGICAL:****(PALEONTOLOGICAL RESOURCES)**

**DURING CONSTRUCTION:** *(The following actions shall occur throughout the duration of the grading construction).*

**(PALEONTOLOGICAL RESOURCES)****PALEO-GR#1 PALEONTOLOGICAL MONITORING**

**INTENT:** In order to comply with Mitigation Monitoring and Reporting Program pursuant to [REDACTED], a Paleontological Resources Grading Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Paleontologist shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the grading monitoring program. The Project Paleontologist shall monitor during the original cutting of previously undisturbed deposits for the project, both on and off site, the Qualified Paleontological Resources Monitor shall be on-site to monitor as determined necessary by the Qualified Paleontologist. The grading monitoring program shall comply with the [County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Paleontological Resources](#). **DOCUMENTATION:** The applicant shall have the contracted Project Paleontologist attend the preconstruction meeting to explain the monitoring requirements. **TIMING:** Prior to Preconstruction Conference, and prior to any clearing, grubbing, trenching, grading, or any land disturbances this condition shall be completed. **MONITORING:** The [DPW, PDCI] shall attend the preconstruction conference and confirm the attendance of the approved Project Paleontologist.

**DURING CONSTRUCTION:** *(The following actions shall occur throughout the duration of the grading construction).*

**(PALEONTOLOGICAL RESOURCES)****PALEO-GR#2 PALEONTOLOGICAL MONITORING**

**INTENT:** In order to comply with Mitigation Monitoring and Reporting Program pursuant to [REDACTED], and the [County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Paleontological Resources](#), a Grading Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Paleontologist shall monitor during the original cutting of previously undisturbed deposits for the project, both on and off site. The Qualified Paleontological Resources Monitor shall be on-site to monitor as determined necessary by the Qualified Paleontologist. The grading monitoring program shall comply with the following requirements during grading:

- a. If paleontological resources are encountered during grading/excavation, the following shall be completed:



1. The Paleontological Resources Monitor shall have the authority to direct, divert, or halt any grading/excavation activity until such time that the sensitivity of the resource can be determined and the appropriate salvage implemented.
  2. The Monitor shall immediately contact the Project Paleontologist.
  3. The Project Paleontologist shall contact the Planning & Development Services immediately.
  4. The Project Paleontologist shall determine if the discovered resource is significant. If it is not significant, grading and/or excavation may resume.
- b. If the paleontological resource is significant or potentially significant, the Project Paleontologist or Paleontological Resources Monitor, under the supervision of the Project Paleontologist, shall complete the following tasks in the field:
1. Salvage unearthed fossil remains, including simple excavation of exposed specimens or, if necessary, plaster-jacketing of large and/or fragile specimens or more elaborate quarry excavations of richly fossiliferous deposits;
  2. Record stratigraphic and geologic data to provide a context for the recovered fossil remains, typically including a detailed description of all paleontological localities within the project site, as well as the lithology of fossil-bearing strata within the measured stratigraphic section, if feasible, and photographic documentation of the geologic setting; and
  3. Transport the collected specimens to a laboratory for processing (cleaning, curation, cataloging, etc.).

**DOCUMENTATION:** The applicant shall implement the grading monitoring program pursuant to this condition. **TIMING:** The following actions shall occur throughout the duration of the grading construction. **MONITORING:** The [DPW, PDCI] shall make sure that the Project Paleontologist is on-site performing the monitoring duties of this condition. The [DPW, PDCI] shall contact the [PDS, PPD] if the Project Paleontologist or applicant fails to comply with this condition.

**ROUGH GRADING:** (Prior to rough grading approval and issuance of any building permit).

## **(PALEONTOLOGICAL RESOURCES)**

### **PALEO-GR#3 PALEONTOLOGICAL MONITORING**

**INTENT:** In order to comply with the adopted Mitigation Monitoring and Reporting Program (MMRP) pursuant to [REDACTED], and the [County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Paleontological Resources](#), a Grading Monitoring Program shall be implemented. **DESCRIPTION OF**

**REQUIREMENT:** The Project Paleontologist shall prepare one of the following letters upon completion of the grading activities that require monitoring:

- a. If no paleontological resources were discovered, submit a "No Fossils Found" letter from the grading contractor to the [PDS, PPD] stating that the monitoring has been completed and that no fossils were discovered, and including the names and signatures from the fossil monitors. The letter shall be in the format of Attachment E of the County of San Diego Guidelines for Determining Significance for Paleontological Resources.
- b. If Paleontological Resources were encountered during grading, a letter shall be prepared stating that the field grading monitoring activities have been completed, and that resources have been encountered. The letter shall detail the anticipated time schedule for completion of the curation phase of the monitoring.

**DOCUMENTATION:** The applicant shall submit the letter report to the [PDS, PPD] for review and approval. **TIMING:** Upon completion of all grading activities, and prior to Rough Grading Final Inspection ([Grading Ordinance SEC 87.421.a.2](#)), the letter report shall be completed.

**MONITORING:** The [PDS, PPD] shall review the final negative letter report or field monitoring memo for compliance with the project MMRP, and inform [DPW, PDCI] that the requirement is completed.

**FINAL GRADING RELEASE:** *(Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).*

## **(PALEONTOLOGICAL RESOURCES)**

### **PALEO-GR#4 PALEONTOLOGICAL MONITORING**

**INTENT:** In order to comply with the adopted Mitigation Monitoring and Reporting Program (MMRP) pursuant to [REDACTED], and the [County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Paleontological Resources](#),

a Grading Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Paleontologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program if resources were encountered during grading. The report shall include the following:

- a. If paleontological resources were discovered, the following tasks shall be completed by or under the supervision of the Project Paleontologist:
  1. Prepare collected fossil remains for curation, to include cleaning the fossils by removing the enclosing rock material, stabilizing fragile specimens using glues and other hardeners, if necessary, and repairing broken specimens;
  2. Curate, catalog and identify all fossil remains to the lowest taxon possible, inventory specimens, assigning catalog numbers, and enter the appropriate specimen and locality data into a collection database;



3. Submit a detailed report prepared by the Project Paleontologist in the format provided in Appendix D of the County of San Diego's Guidelines for Determining Significance for Paleontological Resources. The report shall identify which accredited institution has agreed to accept the curated fossils. Submit two hard copies of the final Paleontological Resources Mitigation Report to the Director of PDS for final approval of the mitigation, and submit an electronic copy of the complete report in Microsoft Word on a USB drive. In addition, submit one copy of the report to the San Diego Natural History Museum and one copy to the institution that received the fossils.
  4. Transfer the cataloged fossil remains and copies of relevant field notes, maps, stratigraphic sections, and photographs to an accredited institution (museum or university) in California that maintains paleontological collections for archival storage and/or display, and submit Proof of Transfer of Paleontological Resources, in the form of a letter, from the director of the paleontology department of the accredited institution to the Director of PDS verifying that the curated fossils from the project site have been received by the institution.
- b. If no resources were discovered, a brief letter to that effect and stating that the grading monitoring activities have been completed, shall be sent to the Director of Planning and Land Use by the Project Paleontologist.

**DOCUMENTATION:** The applicant shall submit the letter report to the [PDS, PPD] for review and approval. **TIMING:** Prior to the occupancy of any structure or use of the premises, and prior to Final Grading Release ([Grading Ordinance Sec. 87.421.a.3](#)), for [REDACTED], the final report shall be completed. **MONITORING:** The [PDS, PPD] shall review the final report for compliance with the project MMRP, and inform [DPW, PDCI] that the requirement is completed.



**ATTACHMENT J**  
**SCOPE FOR GEOLOGIC INVESTIGATION/RECONNAISSANCE REPORT**

The project is located on or within 500 feet of a "Landslide Susceptibility Area." Therefore, a Geologic Reconnaissance Report shall be prepared to evaluate any potential to expose people or structures to potential geologic hazards concerning risks of landslides (including rockfall). The report shall be prepared using the County's approved Guidelines for Determining Significance for Geologic Hazards and conform to report guidelines in the California Board of Geologists and Geophysicists Guidelines for Engineering Geologic Reports. The guidelines can be downloaded at the following web address: [http://www.sandiegocounty.gov/dplu/docs/Geologic\\_Hazards\\_Guidelines.pdf](http://www.sandiegocounty.gov/dplu/docs/Geologic_Hazards_Guidelines.pdf) **The report shall be prepared by a California Certified Engineering Geologist.**

At a minimum, the Geologic Reconnaissance Report should include a review of topographic maps, geologic and soil engineering maps and reports (if available), stereoscopic aerial photograph review, and other published and non-published references. Aerial photographs can be useful in identifying potential landslide features. Several sets of stereoscopic aerial photographs that pre-date project site area development taken at different times of the year are particularly useful in identifying subtle geomorphic features. A field visit will likely be necessary to fill in information in questionable areas, to address the potential risk of rockfall to the project site, and to observe surface features and details that could not be determined from other data sources.

Although engineering design recommendations are generally not a required component of a Geologic Reconnaissance Report, feasible measures to mitigate potential impacts from landslides (including rockfall) to levels below significance and environmental design considerations (where appropriate), should be discussed. Suspected geologic problems that cannot be evaluated except through in-depth investigation should be clearly described in the report. If the Geologic Reconnaissance Report recommends further investigation, a Geologic Investigation must be prepared. The specific requirements to be included in a Geologic Investigation will be determined by the County on a project-by-project basis.

The project site is located within a "Potential Liquefaction Area." As a first screening, the depth to groundwater should be determined for the project site. If the highest historical groundwater level for the project site is determined to be deeper than 50 feet below the existing ground surface or proposed finished grade (whichever is deeper), no further assessment of potential liquefaction is required.

For projects where the highest groundwater level for the project site is determined to be less than 50 feet, further screening of potential liquefaction is required and a Geologic

Reconnaissance Report shall be prepared using the County's approved Guidelines for Determining Significance for Geologic Hazards and follow guidelines in the California Geologic Survey's *Guidelines for Evaluation and Mitigating Seismic Hazards in California, Special Publication 117, Chapter 6 – Analysis and Mitigation of Liquefaction Hazards*. These guidelines can be downloaded from the California Department of Conservation's Geologic Survey website: <http://gmw.consrv.ca.gov/shmp/webdocs/sp117.pdf>. **The report shall be prepared by a California Certified Engineering Geologist.**

Although engineering design recommendations are generally not a required component of a Geologic Reconnaissance Report, feasible measures to mitigate potential impacts from liquefaction to levels below significance and environmental design considerations (where appropriate), should be discussed. Suspected geologic problems that cannot be evaluated except through in-depth investigation should be clearly described in the report. If the Geologic Reconnaissance Report recommends further investigation, a Geologic Investigation must be prepared. The specific requirements to be included in a Geologic Investigation will be determined by the County on a project-by-project basis.



**ATTACHMENT K**  
**SCOPE FOR PHASE I ENVIRONMENTAL SITE ASSESSMENT**

**Project Specific Information:** The applicant submitted a Major Pre Application which proposes the development of a 100-megawatt photovoltaic (PV) solar farm with 20-megawatt battery storage. The project would be located south of Interstate 8 and (mostly) northeast of Old Highway 80 in the Jacumba area of Mountain Empire, within the unincorporated area of the County of San Diego. The proposed project involves the construction, use, and maintenance of PV solar panels mounted on a collection of single-axis tracking systems. The development footprint is approximately 571 acres of the 1,289-acre property. Energy would be stored on-site within lithium ion batteries which are contained within a steel container measuring 40 feet x 8.5 feet x 9.5 feet. Additional components include a 6-foot high chain link fence with barbed wire, landscaping, and groundwater wells for landscape watering and maintenance of the PV system. The property where the facility is proposed includes vacant, undisturbed land as well agricultural.

**Project Scope for Hazardous Materials:** Based on the information provided, the applicant would be required to prepare a Hazardous Materials Business Plan (HMBP) shall be prepared. This will be a condition of the project, and would be required prior to occupancy. The HMBP would be reviewed by the County's Department of Environmental Health Department. For more information regarding HMBP, see the following link:

<http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat.html>

**Agriculture and Possible Hazardous Materials Onsite**

A review of the project site by a County Hazards Specialist indicates that the site may have been subject to a release of hazardous substances that could represent a hazard to the public or the environment.

Specifically, a review of aerial photos of the project site and a search of government agency hazardous materials databases indicates:

- *Historic agricultural use*
- *Potential storage of chemicals*

Based on these observations, a **Phase I Environmental Site Assessment (ESA)** must be completed for the subject parcel. If a Phase I ESA or other site assessment was completed previously (within the last three years), submittal of that study may satisfy this requirement.

If the submitted Phase I ESA indicates that potentially hazardous conditions exist onsite, further soil testing associated with a Limited Phase II ESA will be required to identify whether site conditions represent a human health or environmental hazard.

The Phase I and/or II shall be completed in accordance with the American Society for Testing and Materials (ASTM) Standard Practice for Phase I and II ESA Processes and the 2004 DEH SAM Manual ([http://www.sdcountry.ca.gov/deh/water/sam\\_manual.html](http://www.sdcountry.ca.gov/deh/water/sam_manual.html)). Section 4.VI of the SAM Manual provides a Site Assessment Checklist for the completion of a Phase I ESA.



Note: All reports that include geologic, hydrogeologic, contaminant flow, or contaminant migration interpretation must be prepared by, or under the direct supervision of, a California Registered Geologist, Certified Hydrogeologist, Certified Engineering Geologist, or Registered Civil Engineer. This professional must take full responsibility for the content of the report by signing and/or stamping it with his/her professional seal.

Should soil testing identify contamination in excess of regulatory screening levels, the project will be required to remediate the site under the oversight of San Diego County Department of Environmental Health (DEH) Voluntary Assistance Program (VAP). See [http://www.sandiegocounty.gov/content/dam/sdc/deh/water/docs/sam\\_vap\\_brochure1.pdf](http://www.sandiegocounty.gov/content/dam/sdc/deh/water/docs/sam_vap_brochure1.pdf) for more information regarding participation in the Voluntary Assistance Program.

### **Asbestos/Lead Surveys**

The project description indicated that there are buildings on the property which were ancillary to the agricultural operation, and would be demolished as part of the project. More information is needed about these structures to determine if an asbestos and/or lead survey is required. Depending on the date of construction and/or material used, the structures may have been built prior to the ban on the use of lead-based paint and asbestos-containing materials, and therefore the structures may contain these substances. If hazardous building materials could be disturbed during project development (e.g. from building demolition), surveys are required to determine the location, presence and quantities of these materials. Proper handling and treatment or disposal of hazardous building materials is essential to minimize risks during site development. Please provide more information regarding the structures (e.g., photographic evidence, site visit). Depending on the results, the project may be conditioned for the submittal of surveys prior to demolition.

**The attached Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review.**

## ATTACHMENT L SCOPE FOR FIRE PROTECTION PLAN

A Fire Protection Plan—Full Report shall be provided and be formatted per the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements—Wildland Fire and Fire Protection. The report should include discussion of how the project will comply with section 605.11.4 of the County Consolidated Fire Code. For your reference, section 605.11.4 is provided below with comments.

**Sec. 605.11.4 Ground-mounted photovoltaic arrays.** *Ground-mounted photovoltaic array installations shall meet the requirements of sections 605.11.4.1 through 605.11.4.4.*

**Sec. 605.11.4.1 Fire apparatus access roads.** *Fire apparatus access roads to ground-mounted photovoltaic arrays, associated equipment structures and operations/maintenance buildings shall comply with section 503.*

- Access roads shall extend to within 150 of all portions of buildings and equipment shelters and within 300 feet of all portions of the arrays.
- Add additional north-south fire apparatus access roads such that there is not more than approximately 1,000 feet between intersecting access roads.

**Sec. 605.11.4.1.1 Perimeter fire apparatus access roadway.** *Ground-mounted photovoltaic arrays 10 acres or larger in size shall provide a fire apparatus access roadway around the perimeter of the project. The perimeter fire apparatus access roadway shall comply with section 503.*

- The perimeter access road shall be 24 feet in width, and there shall be pedestrian/man gates approximately every 750 feet along perimeter fences to enable firing operations.

**Sec. 605.11.4.2 Fuel modification.** *Combustible vegetation within the array and to a distance of 30 feet from the array and associated equipment shall be reduced to a height of no more than 6 inches. The fuel modification zone may be increased when required by the fire code official or as recommend by a fire protection plan.*

*Operation/maintenance buildings shall be provided with fuel modification zones that comply with section 4907.2.*

**Sec. 605.11.4.3 Water supply.** *Water supply for fire protection and suppression shall be provided for equipment structures and operations/maintenance buildings as required by section 507.*

- Multiple water storage tanks will be required. The size and locations will be determined when a more detailed plan is submitted.

**Sec. 605.11.4.4 Identification.** *Ground-mounted photovoltaic arrays with multiple equipment structures shall include a means of readily identifying each equipment structure. The fire code official may require a lighted directory map of the project to be installed on-site near the entrance to the facility for projects of 10 or more acres in size.*



**TECHNICAL REPORT**

As an appendix to the fire protection plan, a detailed technical report prepared by a qualified engineer, specialist, or fire safety specialty organization needs to be submitted for the proposed project. The technical report needs to address—but is not limited to—the following items:

- Hazards of the proposed facilities to emergency responders.
- Discussion on how to properly de-energize equipment.
- Signage recommendations (provide figures for each):
  - At each disconnecting means depicting what equipment it de-energizes.
  - Each inverter structure is to be numbered and signed (To be visible from at least 1,000 feet)
  - Lighted directory at the main entrances depicting the overall site plan and the locations of each numbered inverter structure (show location on plot plan).
- Recommended training for emergency personnel. Training will be provided prior to commissioning and on an as requested basis.

**IMPACT TO EMERGENCY SERVICES**

This project, along with all other development, has a cumulative impact on the emergency services for this community. To mitigate for this impact, the project will be conditioned to enter into a Developer Agreement with the SDCFA.

Please call or email me if you have any questions or need clarification – (858) 495-5434 or [James.Pine@sdcounty.ca.gov](mailto:James.Pine@sdcounty.ca.gov).

**The attached [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.**



**ATTACHMENT M**  
**SCOPE FOR GROUNDWATER RESOURCES**

**GROUNDWATER RESOURCES**

Additional information is needed to refine the groundwater resource investigation requirements for this project. In order to fully scope the groundwater investigation requirements for this project, the following information is required:

1. Detailed Water Demand: Provide a detailed description of the water demand (both construction demand and ongoing demand) for the project. All categories of water use must be identified along with backup assumptions and justification of amounts estimated. For reference, please refer to the final project description and groundwater investigation documentation for the Jacumba Solar (MUP-14-041) and Jacumba Community Services District Groundwater Resource Investigation Report for the level of detail necessary for water demand estimates.
2. On-Site Groundwater Wells: Indicate any onsite wells that will be used for the Project. Also, please indicate whether any wells are proposed to be drilled and potential locations for new wells. Include the amount of groundwater proposed from each well and what types of use it is proposed to serve (construction demand vs. ongoing demand).

**GROUNDWATER INVESTIGATION**

Project Specific Information: The following is the Planning and Development Services' (PDS) groundwater investigation preliminary scoping requirements for Jacumba Valley Ranch Solar Project (Project). The Project is planning to develop approximately 571 acres of photovoltaic solar farm on 1,289 acres of privately owned property. The Project is located on private lands in the community of Jacumba, California within unincorporated San Diego County. It should be understood that the groundwater investigation will be an iterative process, and may require additional groundwater scoping by the County beyond this initial scoping letter. Additional scoping will be in regard to any potential additional wells to be drilled, aquifer testing of individual wells, and incorporation of any additional groundwater investigation requirements should the project find it does not have adequate on-site groundwater resources to meet the project's groundwater demand. A number of working meetings between the County Groundwater Geologist and the applicant's hydrogeologist(s) may be necessary to discuss ongoing groundwater investigation findings and any potential additional investigation needed.

Existing On-site Groundwater Use: The Project is located on land that has historically been used for agriculture. A detailed account of historical pumping at the Project location shall be reported

in the Project Groundwater Investigation. Refer to the groundwater investigation for Jacumba Solar (MUP-14-041) to aid in existing and historical groundwater demand.

**Proposed On-site Groundwater Use:** The project description indicates the project will obtain groundwater from existing wells that are located on-site. The project description does not indicate the water demand during construction, nor the ongoing demand post-construction. A detailed account of on-site groundwater uses and quantities are to be included in the project description, as well as the Groundwater Investigation Report. The difference between historic and proposed groundwater quantities shall be reported to evaluate changes in demand.

**General Project Information:** The project is proposing to use groundwater. Based on the potential impacts the project may have on groundwater resources, a groundwater investigation is required to evaluate the significance of potential impacts. The groundwater investigation report must be completed using the County's approved Guidelines for Determining Significance and Report Format and Content Requirements which can be found on the World Wide Web at <http://www.sdcounty.ca.gov/dplu/docs/GRWTR-Guidelines.pdf> (Guidelines) <http://www.sdcounty.ca.gov/dplu/docs/GRWTR-Report-Format.pdf> (Report Formats).

The project is also subject to the Groundwater Ordinance. The investigation must meet the requirements of the SAN DIEGO COUNTY GROUNDWATER ORDINANCE NO. 9826 (NEW SERIES). This document is available at <http://www.sdcounty.ca.gov/dplu/docs/GROUNDWATER-ORD.pdf>

The project is considered to be a water intensive use as defined within the County Groundwater Ordinance. Therefore, the finding within Section 67.722.B is required to be made "that groundwater resources are adequate to meet the groundwater demands both of the project and the groundwater basin if the basin were developed to the maximum density and intensity permitted by the General Plan." Therefore, a cumulative, or basin-wide, groundwater investigation is required for the proposed project. The proposed project cannot be recommended for approval unless the groundwater investigation can demonstrate to the satisfaction of PDS that the required findings within Section 67.722.B of the Groundwater Ordinance can be made.

**Groundwater Investigation Requirements:** Below is a list of items which must be analyzed in the investigation as described in detail in the Guidelines for Determining Significance and Report Format Guidelines and Content Requirements for Groundwater Resources.

**50% Reduction of Groundwater in Storage:** Groundwater recharge must be evaluated for the project site and for the basin. The tributary watershed(s) to be included in the analysis should be presented in advance for PDS review. Please refer to Jacumba Solar (MUP-14-041) groundwater investigation to aid in this process. Estimates of groundwater storage capacity



must be estimated for each hydrogeologic unit at the project site and within the project's watershed. Evaluate the long-term groundwater availability for the project's basin which takes into consideration groundwater recharge, estimated groundwater in storage, and groundwater demand under each of the following scenarios:

- (1) Existing groundwater demand.
- (2) Existing groundwater demand plus the project water demand.
- (3) Existing groundwater demand plus the project water demand and the water demand of all other reasonably foreseeable projects.
- (4) All water uses including those at the maximum build-out of the basin under the current County General Plan.

The evaluation shall indicate whether groundwater in storage will be reduced to a level of 50% or less as a result of potential groundwater extraction at maximum build-out over at least a 30 year period from July 1987 to the present. If storage lowers to more than 50% of calculated groundwater storage at any time, the project would not be recommended for approval.

Well Testing: All wells that will be utilized for this project need to be identified, drilled, and tested as part of the groundwater investigation. It is recommended that the wells be identified as soon as possible. Each well will be tested to evaluate its long-term capacity and to evaluate potential well interference on other well users and/or groundwater dependent habitat (if any is present within the vicinity of the proposed well test locations). The results from each well test will be used to determine whether adequate water exists within the well analyzed without significant well interference/impacts to habitat, or whether additional wells will be required to be drilled and tested. A meeting will be required between the applicant's hydrogeologist(s) and the County Groundwater Geologist to discuss the well testing requirements including production rate for each test, step-drawdown and constant rate well test requirements, on-site monitoring wells to be included during the well test, and development of a list of off-site well users to contact to request voluntary monitoring of their wells during the on-site well testing.

Note: If previous well testing was conducted on proposed well(s), the information can be submitted for County review for consideration in lieu of a new well testing.

Water Quality: The Project description does not address groundwater as a source for potable water. If the Project includes groundwater for potable uses, then water quality shall be considered. As an initial screening of water quality at the site, any new production wells to be utilized for potable water at the site shall be sampled for:

- Gross alpha particles by Standard Method 7110C



- Uranium by EPA Method 908.0/Standard Method 7500-U B
- TDS
- Nitrate
- Total and Fecal Coliform

Water samples should be collected after at least two well bore volumes have been purged from each well. Please follow standard sampling procedures as detailed in Section 4.2.1 and 4.2.2 of the Report Format Requirements. Collect the samples in laboratory certified bottles, place samples in a cooler with ice which must be maintained at a temperature of 4 degrees C, and ensure that samples are analyzed within laboratory holding times. It should be noted on the chain-of-custody that the samples are for drinking water.

Note: If well(s) for potential potable use have recently been tested, existing water quality data may be submitted for review by County staff for consideration in lieu of new sampling.

Well Test Plan: Prior to performing any well test, a well test plan must be prepared and submitted to the County Groundwater Geologist for approval. The well test plan must be prepared by an approved County CEQA Consultant for Groundwater Resources. Additionally, all field work associated must be under the direct supervision of the approved County CEQA Consultant. Submittal and approval of this plan will ensure that the well tests are conducted in compliance with the necessary requirements for the project. For items to include in the plan, please refer to Section 1.0, Well Test Plan in Attachment A of the Report Format Guidelines and Content Requirements for Groundwater Resources.

Groundwater Investigation Report: The report shall follow the items outlined in the County Report Formats. Section 3 and 4 of the report shall include impacts analysis for 50% Reduction in Storage, long-term well yield, potential offsite well interference, groundwater dependent vegetation, and water quality (if potable water is required for this project).

Section 5 shall provide a summary of project groundwater impacts and mitigation. A Groundwater Mitigation and Monitoring Program (GMMP) is recommended based on the findings of the groundwater investigation. If well testing conducted indicates that significant impacts to groundwater dependent habitat or offsite well users are possible due to onsite pumping, thresholds for water level declines in monitoring well(s) may be recommended to

ensure that significant declines in groundwater levels do not extend to groundwater dependent habitat. Should the water level thresholds be met, the GMMP must include mitigation measures that include a reduction or cessation in on-site pumping until water levels in the monitoring wells rise above the thresholds.

### **WELL DESTRUCTION PERMIT**

Project Specific Information: Groundwater wells are present on the project site.

General Information: Planning and Development Services (PDS) has determined that the project site will require a Well Destruction Permit for any wells not be used as part of this project. To apply for a well destruction permit, please contact the Department of Environmental Health (DEH) Land and Water Quality Division at (858) 565-5173. DEH can also provide the current fee that is required to be collected for the permit. The permit must be obtained by a C57 Licensed Contractor who is listed on the DEH approved Well Driller's List at: [http://www.sdcounty.ca.gov/deh/water/docs/lu\\_well\\_drillers\\_4-24-08.pdf](http://www.sdcounty.ca.gov/deh/water/docs/lu_well_drillers_4-24-08.pdf)

A formal letter from the DEH must be submitted to PDS identifying either that the permit has been approved OR is in the process of approval. In addition, prior to the approval of any grading, improvement plans or prior to the recordation of the Final Map, whichever comes first, proof of completion of the well destruction will be conditioned within this permit.

**The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.**

**ATTACHMENT N**  
**SCOPE FOR MINERAL RESOURCES**

The lands within the project site have not been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997); but the site is underlain by Quaternary alluvium. Based on the site's geologic environment and onsite and offsite land uses, the mineral resources beneath the site may be of value to the region and the residents of the state.

A Mineral Resource Investigation Report shall be prepared to investigate mineral resources on and within 1,300 feet of the site to determine if they are significant, if their access would be permanently lost, and whether the loss would be considered significant under CEQA. The report shall be prepared using the County's approved Guidelines for Determining Significance and Report Format and Content Requirements for Mineral Resources which can be found on the World Wide Web at [http://www.sdcounty.ca.gov/PDS/docs/Mineral\\_Resources\\_Guidelines.pdf](http://www.sdcounty.ca.gov/PDS/docs/Mineral_Resources_Guidelines.pdf) (Guidelines) and [http://www.sdcounty.ca.gov/PDS/docs/Mineral\\_Resources\\_Report\\_Formats.pdf](http://www.sdcounty.ca.gov/PDS/docs/Mineral_Resources_Report_Formats.pdf) (Report Formats).

**A Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review.**



## **ATTACHMENT O SCOPE FOR NOISE ANALYSIS**

### Project Specific Information:

The project is known as the Jacumba Valley Ranch Solar Project comprised of a photovoltaic (PV) electric generation facility. The project is located on approximately 1,289 acres within the Mountain Empire Subregional Plan area.

The project site has surrounding off-site rural residences in proximity to the project site and thus may be impacted by noise from the project operations. These associated noise sources must demonstrate that noise exposure levels to these noise sensitive receptors are in conformance with the applicable sound limits of the Noise Element of the General Plan and County noise guidelines. The project site are zoned S80, S88, and S92 which are subject to the most restrictive sound level limit of 45 dBA during the daytime hours and 50 dBA during the nighttime hours pursuant to the County Noise Ordinance Section 36.404. Permanent noise generating equipment and activities involve (but are not limited to) PV trackers, inverter and transformer stations, substations, energy storage operations, and O&M building activities. Temporary construction equipment operations are subject to Sections 36.408, 409, and 410. Temporary operations and temporary activities consisting of heavy equipment operations, grading and site prep, staging area activities, and off-site improvements must also demonstrate County Noise Ordinance compliance.

Based on the above information, an acoustical (noise) study for this project is required. The analysis shall follow the County's Guidelines for Determining Significance for Noise available online at <http://www.sdcounty.ca.gov/PDS/docs/Noise-Guidelines.pdf> and the Report Format and Content Requirements for noise available online at <http://www.sdcounty.ca.gov/PDS/docs/Noise-Report-Format.pdf>.

### Noise Element:

Noise exposure criteria are incorporated into land use planning to reduce future conflicts between noise and land use. This is achieved by specifying acceptable noise exposure ranges for various land uses throughout the County. The County uses the Noise Compatibility Guidelines listed in Table N-1 (Noise Compatibility Guidelines) to determine the compatibility of land use when evaluating proposed development projects.

The Noise Compatibility Guidelines indicate ranges of compatibility and are intended to be flexible enough to apply to a range of projects and environments. For example, a commercial project would be evaluated differently than a residential project in a rural area or a mixed-use project in a more densely developed area of the County.

A land use located in an area identified as "acceptable" indicates that standard construction methods would attenuate exterior noise to an acceptable indoor noise level and that people can carry out outdoor activities with minimal noise interference. Land uses that fall into the "conditionally acceptable" noise environment should have an acoustical study that considers the type of noise source, the sensitivity of the noise receptor, and the degree to which the noise source may interfere with sleep, speech, or other activities characteristic of the land use. For land uses indicated as "conditionally acceptable," structures must be able to attenuate the exterior noise to the indoor noise level as indicated in the Noise Standards listed in Table N-2

(Noise Standards). For land uses where the exterior noise levels fall within the "unacceptable" range, new construction generally should not be undertaken. Please see the following tables below.

<b>Table N-1 Noise Compatibility Guidelines</b>								
Land Use Category		Exterior Noise Level (CNEL)						
		55	60	65	70	75	80	
A	Residential—single family residences, mobile homes, senior housing, convalescent homes							
B	Residential—multi-family residences, mixed-use (commercial/residential)							
C	Transient lodging—motels, hotels, resorts							
D*	Schools, churches, hospitals, nursing homes, child care facilities							
E*	Passive recreational parks, nature preserves, contemplative spaces, cemeteries							
F*	Active parks, golf courses, athletic fields, outdoor spectator sports, water recreation							
G*	Office/professional, government, medical/dental, commercial, retail, laboratories							
H*	Industrial, manufacturing, utilities, agriculture, mining, stables, ranching, warehouse, maintenance/repair							
	<div> <div></div> ACCEPTABLE—Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal construction, without any special noise insulation requirements. </div>							
	<div> <div></div> CONDITIONALLY ACCEPTABLE—New construction or development should be undertaken only after a detailed noise analysis is conducted to determine if noise reduction measures are necessary to achieve acceptable levels for land use. Criteria for determining exterior and interior noise levels are listed in Table N-2, Noise Standards. If a project cannot mitigate noise to a level deemed Acceptable, the appropriate county decision-maker must determine that mitigation has been provided to the greatest extent practicable or that extraordinary circumstances exist. </div>							
	<div> <div></div> UNACCEPTABLE—New construction or development shall not be undertaken. </div>							

\* Denotes facilities used for part of the day; therefore, an hourly standard would be used rather than CNEL (refer to Table N-2).

*Note: For projects located within an Airport Influence Area of an adopted Airport Land Use Compatibility Plan (ALUCP), additional Noise Compatibility Criteria restrictions may apply as specified in the ALUCP.*

### Excerpts from Table N-2 within the County Noise Element

1. The exterior noise level (as defined in Item 3) standard for Category A shall be 60 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
2. The exterior noise level standard for Categories B and C shall be 65 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.



3. The exterior noise level standard for Categories D and G shall be 65 CNEL and the interior noise level standard shall be 50 dBA Leq (one hour average).
4. For single-family detached dwelling units, "exterior noise level" is defined as the noise level measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum net lot area:
  - (i) for lots less than 4,000 square feet in area, the exterior area shall include 400 square feet,
  - (ii) for lots between 4,000 square feet to 10 acres in area, the exterior area shall include 10 percent of the lot area;
  - (iii) for lots over 10 acres in area, the exterior area shall include 1 acre.
5. For all other residential land uses, "exterior noise level" is defined as noise measured at exterior areas which are provided for private or group usable open space purposes. "Private Usable Open Space" is defined as usable open space intended for use of occupants of one dwelling unit, normally including yards, decks, and balconies. When the noise limit for Private Usable Open Space cannot be met, then a Group Usable Open Space that meets the exterior noise level standard shall be provided. "Group Usable Open Space" is defined as usable open space intended for common use by occupants of a development, either privately owned and maintained or dedicated to a public agency, normally including swimming pools, recreation courts, patios, open landscaped areas, and greenbelts with pedestrian walkways and equestrian and bicycle trails, but not including off-street parking and loading areas or driveways.
6. For non-residential noise sensitive land uses, exterior noise level is defined as noise measured at the exterior area provided for public use.
7. For noise sensitive land uses where people normally do not sleep at night, the exterior and interior noise standard may be measured using either CNEL or the one-hour average noise level determined at the loudest hour during the period when the facility is normally occupied.
8. The exterior noise standard does not apply for land uses where no exterior use area is proposed or necessary, such as a library.
9. For Categories E and F the exterior noise level standard shall not exceed the limit defined as "Acceptable" in Table N-1 or an equivalent one-hour noise standard.

Noise Ordinances:

A preliminary review of the project information provided indicates that there is insufficient information to determine whether permanent equipment and operations on-site will exceed sound level limits of the San Diego County Noise Ordinance (Section 36.404). The County Noise



Ordinance does not permit noise levels that impact adjoining properties or exceed County Noise Standards. The project site as well as adjacent land uses are zoned S80, S88, and S92 which allows a one-hour average sound level of 50 decibels (dBA) from 7 a.m. to 10 p.m. and 45 decibels (dBA) from 10 p.m. to 7 a.m. In order for the Department to make a determination on the project's conformance with County noise standards, the applicant must demonstrate that the hourly average sound levels do not exceed either threshold at the property line, as the most stringent Ordinance condition for the project.

The sound level limit at a location on a boundary between two zones is the arithmetic mean of the respective limits for the two zones.

S88 zones are Specific Planning Areas which allow different uses. The sound level limits in Table 36.404 above that apply in an S88 zone depend on the use being made of the property. The limits in Table 36.404, subsection (1) apply to property with a residential, agricultural or civic use. The limits in subsection (3) apply to property with a commercial use. The limits in subsection (5) apply to property with an industrial use that would only be allowed in an M50, M52 or M54 zone. The limits in subsection (6) apply to all property with an extractive use or a use that would only be allowed in an M56 or M58 zone.

A preliminary review of the project information provided indicates that there is insufficient information to determine whether temporary construction equipment and operations on-site will exceed sound level limits of the San Diego County Noise Ordinance (Sections 36.408 and 36.409):

#### Section 36.408

Except for emergency work, it shall be unlawful for any person to operate or cause to be operated, construction equipment:

- (a) Between 7 p.m. and 7 a.m.
- (b) On a Sunday or a holiday. For purposes of this section, a holiday means January 1st, the last Monday in May, July 4th, the first Monday in September, December 25th and any day appointed by the President as a special national holiday or the Governor of the State as a special State holiday. A person may, however, operate construction equipment on a Sunday or holiday between the hours of 10 a.m. and 5 p.m. at the person's residence or for the purpose of constructing a residence for himself or herself, provided that the operation of construction equipment is not carried out for financial consideration or other consideration of any kind and does not violate the limitations in sections 36.409 and 36.410.

#### Section 36.409

Except for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated, that exceeds an average sound level of 75 decibels for an eight-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received. Amended by Ord. No. 9962 (N.S.), effective 1-9-09.

**Section 36.410**

A preliminary review of the project information provided by the AEIS indicates that there is insufficient information to determine whether impulsive construction equipment operations on-site will exceed sound level limits of the San Diego County Noise Ordinance):

- (a) Except for emergency work or work on a public road project, no person shall produce or cause to be produced an impulsive noise that exceeds the maximum sound level shown in [Table 36.410A](#), when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is received, for 25 percent of the minutes in the measurement period, as described in subsection (c) below. The maximum sound level depends on the use being made of the occupied property. The uses in [Table 36.410A](#) are as described in the County Zoning Ordinance.

**TABLE 36.410A.  
MAXIMUM SOUND LEVEL (IMPULSIVE) MEASURED AT OCCUPIED PROPERTY IN  
DECIBELS (dBA)**

OCCUPIED PROPERTY USE	DECIBELS (dBA)
Residential, village zoning or civic use	82
Agricultural, commercial or industrial use	85

- (b) Except for emergency work, no person working on a public road project shall produce or cause to be produced an impulsive noise that exceeds the maximum sound level shown in [Table 36.410B](#), when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is received, for 25 percent of the minutes in the measurement period, as described in subsection (c) below. The maximum sound level depends on the use being made of the occupied property. The uses in [Table 36.410B](#) are as described in the County Zoning Ordinance.

**TABLE 36.410B  
MAXIMUM SOUND LEVEL (IMPULSIVE) MEASURED AT OCCUPIED PROPERTY IN  
DECIBELS (dBA) FOR PUBLIC ROAD PROJECTS**

OCCUPIED PROPERTY USE	dB(A)
Residential, village zoning or civic use	85
Agricultural, commercial or industrial use	90

- (c) The minimum measurement period for any measurements conducted under this section shall be one hour. During the measurement period a measurement shall be conducted every minute from a fixed location on an occupied property. The measurements shall measure the maximum sound level during each minute of the measurement period. If the



sound level caused by construction equipment or the producer of the impulsive noise exceeds the maximum sound level for any portion of any minute, it will be deemed that the maximum sound level was exceeded during that minute.

(Added by Ord. No. 9962 (N.S.), effective 1-9-09)

To determine conformance to the County Noise Ordinance, a noise study is required and it is essential that this component of this analysis include the following information:

Permanent Noise Sources:

- (1). Manufacturers Spec Sheet and/or field measurements for all noise producing equipment on-site that identifies the ARI standard and/or decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (2). Field measurements and/or noise source data for all noise producing operations and activities on-site that identifies a decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (3). Additional plot plans that identifies the site location of all noise sources in relation to property lines. Discuss the worst-case noise source to property line distances (in feet). It is essential to address all potential noise sources on-site and to include a discussion related to openings within all surrounding walls or fences, such as driveways, fencing and gates.
- (4). Hours of operation and activity level at each hour.
- (5). Demonstrate that the proposed project noise generating equipment comprised of (but not limited to) PV trackers, inverter and transformer stations, substations, energy storage operations, and O&M building activities comply with the property line sound level limits per County noise standards.
- (6). Include any recommended design features and mitigation measures if required to demonstrate compliance with the County Noise Ordinance, Section 36.404.

Temporary Construction Equipment Operations:

- (7). Manufacturers Spec Sheet and/or field measurements for all construction equipment that identifies a decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (8). Additional plot plans that identifies the site location of all construction equipment noise sources in relation to property lines. It is essential to address all potential construction equipment noise sources on-site.



- (9). Identify all existing occupied property/structures adjacent to the boundary of the project site.
- (10). Include the schedule of the grading activities, phasing and preparation of the project site.
- (11). Include the potential staging area locations and noise assessment. Discuss project related noise generating activities associated with off-site improvements.
- (12). Address the associated cut and fill of materials, and specify whether the operations of general construction equipment and/or impulsive construction equipment are proposed (e.g. drill rigs, rock crushers, hoe rams, etc).
- (13). Address the proposed helicopter operations and when these will be used during the phase of the project. Clearly discuss why helicopters are proposed, and determine potential locations of take-off, landing, and flight path. Include a noise assessment associated with these operations.
- (14). Include any recommended design features and/or temporary construction/demolition mitigation measures if required to demonstrate compliance with County Noise Ordinance, Section 36.409.

General information: A noise analysis is needed to determine whether or not noise levels exceed San Diego County standards. Noise analysis shall occur when the project is adjacent to heavily traveled roads, railroad tracks, airports, or heavy industrial operations. Noise analysis may also be required for a project that generate high levels of noise either through activities directly associated with the proposal or major increases in traffic generated by the proposal (direct and cumulative impacts).

If the noise impacts are associated with traffic movements, airports, or other transportation activities, a noise analysis shall utilize field measurements and projected transportation noise levels to determine the potential for impacts to present and future residents of the project. The noise analysis must conform to the Noise Element of the San Diego County General Plan.

If the noise impacts are associated with activities on the site, such as rock crushing or some other proposed activity, the noise analysis shall include estimates of noise generation potential from the site utilizing measurements from similar activities that are already in existence. The noise analysis must conform to the San Diego County Noise Ordinance.

**The attached Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review.**

**ATTACHMENT P**  
**SCOPE FOR GREENHOUSE GAS ANALYSIS**

Project Specific Information:

The proposed project has the potential to generate greenhouse gas (GHG) emissions, related to construction and operation of the proposed activities. Therefore, the project is required to discuss its potential impacts to GHG by preparing a Climate Change Analysis Report.

General Information:

Based on the potential impacts the project may have on global climate change, a Climate Change Analysis Report is required.

The annual 900 metric tons (MT) of carbon dioxide-equivalent (CO<sub>2</sub>e) screening level is used which is referenced in the California Air Pollution Control Officers Association (CAPCOA) California Environmental Quality Act (CEQA) and Climate Change white paper dated January 2008 which can be found at <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>. A review of the project indicates that the size-based screening criteria would not apply to the project and additional analysis is necessary to determine if the project has the potential to exceed the screening level. If the proposed project exceeds the 900 MTCO<sub>2</sub>e per year screening level, the applicant should consult with County staff to determine the appropriate threshold for the project and if further analysis and identification of project design features or potential mitigation measures is required.

Emissions of pollutants of concern from the proposed project may occur from construction and operational activities. In general, GHG emissions from construction activities include the use of construction equipment, drilling equipment, trenching equipment, helicopters, explosives detonation, wire stringing, tracker installation, inverter station installation, gen-tie line construction, substation construction, building construction, landscaping, haul trucks (e.g., soil and excavated rock import/export), vendor vehicles (e.g., building material delivery, concrete delivery, water truck trips, blasting material delivery), worker commute vehicles, and stationary equipment (such as generators, if any). GHG emissions from operational activities include helicopters and traffic throughout project site and beyond, other mobile sources, area sources, energy use, water consumption, solid waste generation, and vegetation removal. The analysis must assess emissions from project components that may contribute to construction and operational emissions. GHG emissions from decommissioning activities are similar to those generated by construction activities, which include the use of construction equipment, haul truck, worker commute vehicles, and stationary equipment (such as generators, if any).

Additionally, the following issues should be addressed as part of the climate change analysis:

1. Would the proposed project generate GHG emissions that could contribute substantially to global climate change?
2. Would implementation of the proposed project interfere with the GHG reduction goals in California (e.g., Assembly Bill 32, Senate Bill 32)?



Any proposed project design elements that may be incorporated to minimize GHG emissions should be described in the project description.

**The attached [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.**



**ATTACHMENT Q**  
**FEDERAL AVIATION ADMINISTRATION (FAA)**  
**NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION**

The proposed project is located within the FAA Notification Surface due to its proximity to Jacumba airport, which requires that notice be filed with the FAA. You are required to fill out and submit FAA Form 7460-1 Notice of Proposed Construction or Alteration to the FAA. The form is available at <http://forms.faa.gov/forms/faa7460-1.pdf> and a copy attached for your reference. The form may be submitted electronically via the Obstruction Evaluation website: [www.oaaaa.faa.gov](http://www.oaaaa.faa.gov) and the status of submitted forms may also be tracked via that website. Alternatively, you may file FAA form 7460-1 via US Postal Mail to:

Express Processing Center  
Federal Aviation Administration  
Southwest Regional Office  
Obstruction Evaluation Service, AJR-32  
2601 Meacham Boulevard  
Fort Worth, TX 76137-0520

Federal Aviation Administration  
Western-Pacific Region  
P.O. Box 92007  
Los Angeles, CA 90009

When the FAA receives the Form, they will acknowledge receipt of the notice filed by the applicant. The FAA will then send the applicant the outcome of the initial screening either indicating that the proposed development project is not an obstruction and would not be a hazard to air navigation; or that the proposed development project is an obstruction unless reduced to a specified height.

**General Information:**

All applicants proposing any construction or alterations that may affect navigable airspace must file a Notice of Proposed Construction or Alteration (Form 7460-1) with the FAA. Part 77 requires that any applicant who intends to perform any of the following construction or alterations must notify the FAA:

1. Any construction or alteration exceeding 200 feet in height above ground level.
2. Any construction or alteration of structures, antennas, trees, mobile objects, and temporary objects such as construction cranes that:
  - A) Are within a horizontal distance of 20,000 feet from a public use or military airport and exceed a 100:1 surface from any point on the runway to each airport with at least one runway more than 3,200 feet.
  - B) Are within a horizontal distance of 10,000 feet from a public use or military airport and exceed a 50:1 surface from any point on the runway to each airport with at least one runway no more than 3,200 feet.
  - C) Are within a horizontal distance of 5,000 feet of a public use heliport and exceed a 25:1 surface.

3. Any highway, railroad or other traverse way where the prescribed adjusted height would exceed that above noted criteria.
4. When requested by the FAA.
5. Any construction or alteration located on a public use airport or heliport regardless of height or location.

This proposed project is located within the FAA's 100:1 notification surface. The FAA uses the 100:1 notification surface to help identify projects that may interfere with airport operations. A project exceeding the 100:1 notification surface is not necessarily incompatible, but rather requires that the FAA be notified, so they can conduct an aeronautical study. Based upon the information provided by the applicant to the FAA, the FAA will determine if the project would be an airspace obstruction or hazard.

#### **REQUIREMENT FOR SUBMITTAL OF AN APPLICATION FOR A CONSISTENCY DETERMINATION WITH THE SAN DIEGO REGIONAL AIRPORT AUTHORITY**

##### **Major Project Issue:**

The project is located within the Airport Influence Area (AIA) of the Jacumba airport. The project is located within Zone 1 - Zone 6 of the Airport's Airport Land Use Compatibility Plan (ALUCP). Solar Panels are not compatible within the Runway Protection Zone (RPZ), Safety Zone 1 of the ALUCP. Zone 2 has a lot coverage maximum of 50% and Zone 4 has a lot coverage maximum of 70%. It is not clear if the project proposes to encroach into that zone. As such, it is not known at this time if an airport hazards assessment is required. **The plot plan must depict to scale the safety zones over the affected properties. Please identify the lot coverage percentage of the solar panels in these zones to determine compliance with this regulation.** This is stated on the application form, and georeferenced downloadable GIS files are available on our website for a project sponsor to do that, with the link in our form: [http://www.san.org/Portals/0/Documents/Land%20Use%20Compatibility/2017-11-17 ALUC Application Determination Consistency.pdf](http://www.san.org/Portals/0/Documents/Land%20Use%20Compatibility/2017-11-17%20ALUC%20Application%20Determination%20Consistency.pdf)

##### **Major Project Issue:**

Solar panels could be a glare and glint hazard for aircraft in flight. The project must demonstrate that glare will not impact airspace safety. Recommendations for meeting this standard are described in Section 3.1.2 of the Federal Aviation Administration (FAA) Solar Guide. For off-airport projects, local governments, solar developers, and other stakeholders in the vicinity of an airport have the responsibility to inform the FAA about proposed projects so that the agency can determine if the project, specifically if large, presents any safety or navigational problems. **A photovoltaic glint and glare study will be required. It is recommended that the applicant work directly with the County of San Diego Airport Staff with respect to the glint and glare study and subsequently attain the necessary Federal Aviation Administration (FAA) and State Division of Aeronautics approvals.**

An application for a determination of consistency with the Airport Land Use Compatibility Plan (ALUCP) for said airport is required to be submitted to the San Diego County Regional Airport Authority (SDCRAA). See [http://www.san.org/airport\\_authority/splash.asp](http://www.san.org/airport_authority/splash.asp) for more information. The SDCRAA is charged with this responsibility based on California Law. The County is responsible for filing the application. **Please submit a copy of a grant deed for the**

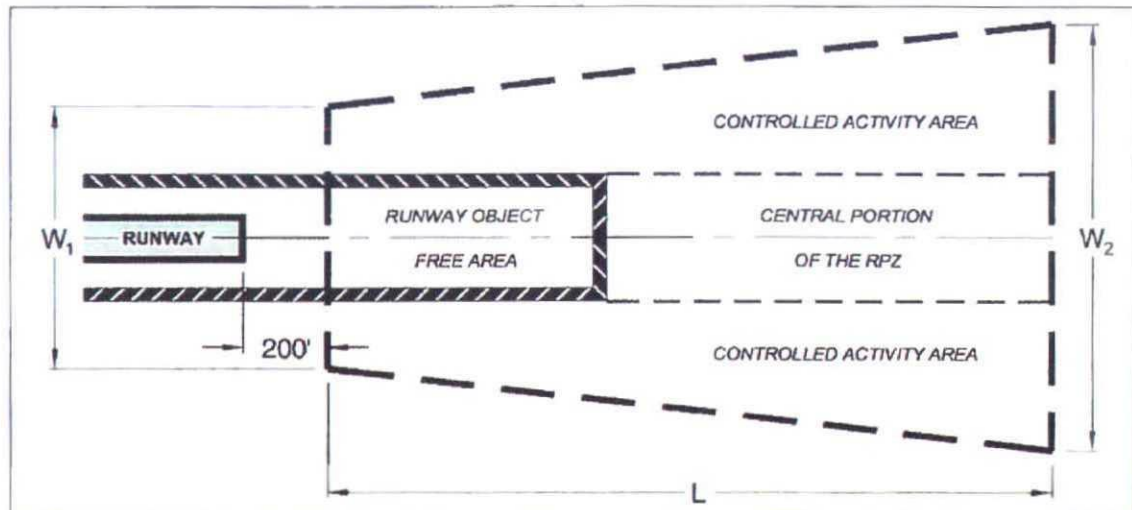


**project and a project site plan/map with floor plans and dimensioned elevations for inclusion with this application.** Since the project is located within an FAA Height Notification Surface, the application will be filed upon receipt of the outcome of the FAA evaluation. The application will be submitted at the time of the issuance of this letter, or shortly thereafter. However, for projects which are anticipated to undergo significant revisions, the application filing may be delayed until the design is closer to final form.

The SDCRAA will hold a public hearing if the FAA determines the project to be hazard to air navigation because it would thus also be inconsistent with the applicable ALUCP.



Figure 13: Restricted Areas Near a Runway End



Source: Advisory Circular 150/5300-13, Airport Design

In general, the FAA does not recommend that sponsors locate solar facilities in the RPZ. However, the FAA will consult on specific proposals like the one presented by Fresno on a case-by-case basis (see Case Study #2, Solar Project Siting at Fresno Yosemite International Airport). Working with the FAA in advance of site selection to confirm the appropriate siting relative to any discretionary criteria is important whether conducted as part of a larger master planning process or as a stand-alone project.

### 2.3.3 Consistency with Aviation and Airport Activities

Airports have a primary mission to serve the flying public and facilitate safe and convenient air travel. All other activities occurring at airports must support this primary mission and therefore must be consistent with those fundamental activities.

In assuring compatibility, airport sponsors should use guidance provided in the *Airport Design AC* (150/5300-13) when siting PV installations and work with the FAA, State Aeronautics Divisions, and stakeholders on master planning activities. While the *Airport Design AC* provides clear information about areas critical to the protection of people and property, other planning activities like those associated with solar facilities are discretionary. Working through the issues to understand the basic implications of siting decisions will require information gathering, consultation, and education. In determining whether a proposed solar project is compatible with aeronautical activities, sponsors should consider the following.

1. The project cannot be located in a Runway Object Free Area, Obstacle Free Zone, Runway Safety Area, Taxiway Object Free Area or a Taxiway Safety Area.
2. The project cannot penetrate imaginary surfaces that define the lower limits of airspace including the clearway.
3. The project must demonstrate that glare will not impact airspace safety. (Recommendations for meeting this standard are described in Section 3.1.2.)



## Case Study #3 – Evaluating Airspace Issues

### Metropolitan Oakland International Airport – California



Oakland International's General Aviation Airport is host to a 756 kW ground-mounted system owned and operated by a private company, which sells power back to the Port of Oakland at a discount. The project consists of 4,000 fixed solar panels.

While the private developer was responsible as project applicant to file a 7460 Notice of Construction or Alteration with the FAA for airspace review, it was critical that airport personnel play an active role in assessing siting issues to ensure that the project would not produce a negative impact on airspace or aviation activities. The airport is knowledgeable about FAA airport design standards and flight operations, and works on a daily basis with FAA personnel in the Air Traffic Control Tower and ADO.

The three issues that Oakland evaluated during project siting were airspace penetration, radar interference, and glare. Because it was exploring a location along a service road near the GA runway, consideration of the imaginary surface extending out from the edge of Runway 6/27 was a critical consideration even with low profile panels. As a result, the panels were located approximately 400 feet from the runway avoiding any penetration of the imaginary surface of airspace. Second, the siting had to consider the location of the panels relative to NavAids. A radar system is located to the west of the proposed site. After consultation with the FAA, it was decided to preserve a 500-foot buffer from the radar to protect against any interference. Third, the airport discussed the potential for glare to impact the air traffic control tower. The FAA determined that, based on the available information, that glare would not cause a negative impact. However, to ensure that it could address any unforeseen problem, the FAA indicated that it would preserve the right to remove the project if a significant impact were to occur.

The project has been operational since November 2007 and there have been no reports of airspace impacts from radar or glare on the air traffic control tower or on pilots. One of the keys to a smooth approval process was close coordination between the airport, the solar developer, and the FAA from the earliest phases of the project.



of historic airport buildings may require approval to ensure that the solar panels do not adversely impact the historic value of the structure. Ground-mounted projects that disturb soils may need to conduct an archaeological study to ensure that below-ground historic resources are not impacted.

### 3.3 Off-Airport

Solar projects constructed off-airport are proposed and managed by private developers and public agencies. They include a wide variety of technologies (PV, solar thermal, and concentrated solar power) and sizes (residential, commercial, and utility-scale or grid-fed). While projects proposed on-airport have a direct link with FAA authority and agency NEPA responsibilities, the need for FAA airspace review is less clear the farther away projects are from the airport fence. The FAA has broad authority for airspace review and the evaluation of any solar project that could pose a potential hazard to air navigation.

The clearest trigger for FAA review is a physical penetration of airspace. It is well-established that structures rising 200 feet or greater above the land surface must be reviewed by the FAA. Tall structures, such as wind turbines, cell towers, and communication antennae customarily rise above 200 feet and proponents know that an airspace review is required. The FAA will review the location of structures and, depending on their proximity to existing airports, will either limit their height to remain out of flight paths or condition their approval to day and night obstruction lighting. Concentrated solar power projects with power towers may rise to a height of 200 feet or greater, triggering an airspace review. Many other solar projects including parabolic trough and PV farms will not and therefore the need to file a notice with the FAA may not be clear.

Currently, no defined thresholds for project size, type, or distance from the airport are available that automatically trigger FAA airspace review. However, proximity to the airport and CSP technology are two indicators of likely FAA interest in a solar project.

Some utility-scale solar projects have been sited on Federal lands subsequent to a bid to lease land from a Federal agency such as the Bureau of Land Management (BLM). Due to their location, these projects are subject to NEPA review with the land holder (e.g., BLM, Air Force) acting as the lead Federal agency coordinating the NEPA review. For these projects, mechanisms including Federal register notices and inter-agency communications should be sufficient to alert the FAA that the project is proposed. It would then be incumbent upon the FAA to inform the applicant that it requires an airspace review.

How the FAA is notified about potential impacts to airspace, or how it hears about pending solar projects, varies. However, it is the responsibility of local governments, solar developers, and other stakeholders in the vicinity of an airport to check with the airport sponsor and the FAA to ensure there are no potential safety or navigational problems with a proposed solar facility, especially if it is a large facility. Likewise, sponsors must be aware of nearby off-airport activities that could have a negative effect on the safe and efficient operation of the airport. Sponsors should notify the FAA when such activities are proposed and FAA needs to participate in public meetings or permitting processes.